August 28, 2015

Ms. Carlotta Stauffer, Commission Clerk
Florida Public Service Commission
2540 Shumard Oak Boulevard
Tallahassee, FL 32399-0850

RE: Docket No. 150007-EI
Dear Ms. Stauffer:
Enclosed for official filing in the above-referenced docket are the following:

1. The Petition of Gulf Power Company.
2. Prepared direct testimony of and exhibit James O. Vick.
3. Prepared direct testimony and exhibit of C. Shane Boyett.

Pursuant to the Order Establishing Procedure in this docket, electronic copies of exhibit CSB-3 will be provided to the parties under separate cover.

Sincerely,


# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION 

## IN RE: Environmental Cost Recovery Clause )

) Docket No.: 150007-EI
) Filed: August 31, 2015
)

# PETITION OF GULF POWER COMPANY FOR APPROVAL OF FINAL ENVIRONMENTAL COST RECOVERY TRUE-UP AMOUNT FOR JANUARY 2014 THROUGH DECEMBER 2014; ESTIMATED ENVIRONMENTAL COST RECOVERY TRUE-UP AMOUNT FOR JANUARY 2015 THROUGH DECEMBER 2015; PROJECTED ENVIRONMENTAL COST RECOVERY AMOUNTS FOR JANUARY 2016 THROUGH DECEMBER 2016 INCLUDING NEW ENVIRONMENTAL ACTIVITIES/PROJECTS; AND ENVIRONMENTAL COST RECOVERY FACTORS TO BE APPLIED BEGINNING WITH THE PERIOD JANUARY 2016 THROUGH DECEMBER 2016 

Notices and communications with respect to this petition and docket should be addressed to:

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Robert L. McGee, Jr.<br>Regulatory and Pricing manager<br>Gulf Power Company<br>One Energy Place<br>Pensacola, FL 32520-0780

GULF POWER COMPANY ("Gulf Power", "Gulf", or "the Company"), by and through its undersigned counsel, and pursuant to section 366.8255 , Florida Statutes and various orders of the Florida Public Service Commission ("Commission") implementing and defining the Environmental Cost Recovery Clause ("ECRC"), hereby petitions the Commission for approval of the Company's final environmental cost recovery true-up amount for the period January 2014 through December 2014; for approval of the Company's estimated environmental cost recovery true-up amount for the period January 2015 through December 2015; for approval of the Company's projected environmental cost recovery amounts for the period January 2016 through December 2016 including the reasonableness and prudence of new and/or expansions of other environmental projects consistent with this petition; and for approval of environmental cost
recovery factors to be applied in customer billings beginning with the period January 2016 through December 2016. As grounds for the relief requested by this petition, the Company would respectfully show:

## BACKGROUND

(1) Section 366.8255, Florida Statutes, (the "Statute") authorizes the Commission to review and decide whether Gulf's environmental compliance costs are recoverable through an environmental cost recovery factor. Pursuant to the Statute, environmental compliance costs include "[a]ll costs or expenses incurred by an electric utility in complying with environmental laws or regulations. . . ." The term "environmental laws or regulations" is defined in the Statute to include "all federal, state, or local statutes, administrative regulations, orders, ordinances, resolutions, or other requirements that apply to electric utilities and are designed to protect the environment." Pursuant to the Statute, the Commission shall allow a utility to recover its prudently incurred environmental compliance costs through the ECRC, which is separate and apart from the utility's base rates. Only prudently incurred environmental compliance costs may be recovered through the ECRC. In Order No. PSC-94-0044-FOF-EI, issued January 12, 1994, the Commission identified three criteria for eligibility for cost recovery through the ECRC: 1) the costs must have been incurred after April 13, 1993; 2) the activity is legally required to comply with a governmentally imposed environmental regulation which was enacted, or became effective, or whose effect was triggered after the company's last test year upon which rates are based; and, 3) the costs are not recovered through some other cost recovery mechanism or through base rates.
(2) Gulf Power initially petitioned the Commission to establish the ECRC in Docket No. 930613-EI. The Commission considered Gulf's petition at hearings held in December 1993
and ultimately issued Order No. PSC-94-0044-FOF-EI, which established the ECRC for Gulf Power and approved the commencement of recovery through initial factors effective with the first billing cycle for February 1994. Since that initial order, Gulf has periodically petitioned for and received Commission approval for recovery of the Company's revenue requirements associated with new environmental compliance activities consistent with the ECRC statutes and Commission precedent. Also since that initial order and subsequent orders of the Commission approving the Company's environmental compliance activities for recovery through the ECRC, Gulf has periodically submitted true-up and projection filings to the Commission with updated actual and projected costs for the various environmental compliance activities recovered through the ECRC pursuant to Commission authorization.
(3) Consistent with the foregoing, Gulf submits its petition, supporting schedules, testimony, and exhibits as the Company's request herein for approval of ECRC factors to be effective in calendar year 2016. As detailed in the following paragraphs and accompanying supporting schedules, testimony and exhibits, Gulf's environmental compliance activities are consistent with the ECRC statutes and Commission precedent for recovery of eligible activities through the ECRC subject to the ongoing audit, review and true-up processes established by the Commission.

## FINAL ENVIRONMENTAL COST RECOVERY TRUE-UP

(4) By vote of the Commission following hearings in October 2014, estimated true-up environmental cost recovery amounts were approved by the Commission for the period January 2014 through December 2014, subject to establishing the final environmental cost recovery true-up amounts. Gulf has calculated its final environmental cost recovery true-up amounts for the period January 2014 through December 2014 in accordance with the principles and policies for environmental cost recovery established by the Commission. According to the data filed by Gulf for the period ending December 31, 2014, the final environmental cost recovery true-up amount for the period ending December 31, 2014, is an actual under-recovery of $\$ 912,783$. This amount is submitted for approval by the Commission to be collected in the next period. The
supporting data has been prepared in accordance with the uniform system of accounts as applicable to the Company's environmental cost recovery and fairly presents the Company's environmental costs to be considered for recovery through the ECRC for the period. The environmental activities and related expenditures reflected in the true-up amounts shown for the period ending December 31, 2014, are reasonable and necessary to achieve or maintain compliance with environmental requirements applicable to Gulf Power Company and, therefore, the amounts identified are prudent expenditures which have been incurred for utility purposes.

## ESTIMATED ENVIRONMENTAL COST RECOVERY TRUE-UP

Gulf has calculated its estimated environmental cost recovery true-up amounts for the period January 2015 through December 2015 in accordance with the principles and policies for environmental cost recovery established by the Commission. Based on six months actual and six months projected data, the Company's estimated environmental cost recovery true-up amount for the period January 2015 through December 2015 is an under-recovery of $\$ 1,699,128$. The estimated environmental cost recovery true-up is combined with the final environmental cost recovery true-up for the period ending December 31, 2014, to reach the total environmental cost recovery true-up that is to be addressed in the next cost recovery period (January 2016 through December 2016). Gulf is requesting that the Commission approve this total environmental cost recovery true-up amount excluding revenue taxes, $\$ 2,611,911$ for recovery during the January 2016 through December 2016 recovery period.

## PROJECTED ENVIRONMENTAL COST RECOVERY AMOUNTS

(6) Gulf has calculated its projected environmental cost recovery amounts for the months January 2016 through December 2016 in accordance with the principles and policies for environmental cost recovery found in section 366.8255 of the Florida Statutes and Commission Order No. PSC-94-0044-FOF-EI. The Company's projected environmental cost recovery amounts for the period January 2016 through December 2016 is $\$ 197,765,402$. The calculated factors reflect the recovery of the projected environmental cost recovery amounts, including net
true-up amounts and revenue taxes, of \$200,521,584 for the period January 2016 through December 2016.

The computations and supporting data for the Company's environmental cost recovery factors are set forth on true-up and projection schedules that are attached as part of the exhibits to the final true-up testimony and actual/estimated true-up testimony of C.S. Boyett filed previously in this docket (See DN 01762-15 and DN 04856-15) and the projection testimony of Mr. Boyett filed herewith. Additional supporting data for the environmental cost recovery factors is provided in the final true-up testimony and estimated/actual true-up testimony of J.O. Vick, also previously filed in this docket (See DN 01762-15 and DN 04856-15), and the projection testimony of Mr. Vick also filed herewith. The data and other information set forth in these schedules are sponsored and/or supported by the testimony of Gulf witnesses Boyett and Vick are an integral part of this petition and are hereby incorporated herein by reference. The methodology used by Gulf in determining the amounts to include in these factors and the allocation to rate classes is in accordance with the requirements of the Commission as set forth in Order No. PSC-94-0044-FOF-EI. The amounts included in the calculated factors for the projection period are based on reasonable projections of the costs for environmental compliance activities that are expected to be incurred during the period January 2016 through December 2016. The calculated factors and supporting data have been prepared in accordance with the uniform system of accounts and fairly present the Company's best estimate of environmental compliance costs for the projected period. The activities described in the testimony of Mr. Vick are reasonable and necessary to achieve or maintain compliance with environmental requirements applicable to Gulf Power Company and the actual or projected costs resulting from the described compliance activities are also reasonable and necessary. Therefore, the costs identified are prudent expenditures that have been or will be incurred for utility purposes and for which the Company should be allowed to recover the associated revenue requirements.

## NEW ENVIRONMENTAL ACTIVITIES/PROJECTS

(7) Gulf seeks approval of the following new activities/projects for cost recovery through the Environmental Cost Recovery Clause:
(a.) Coal Combustion Residual ("CCR") project: This project addresses costs associated with Gulf's compliance with new requirements from the United States Environmental Protection Agency ("EPA") and the Florida Department of Environmental Protection ("FDEP"). On April 17, 2015, EPA published the final Coal Combustion Residuals ("CCR Rule") rule in the Federal register regulating CCR disposal under Subtitle D of the Resource Conservation and Recovery Act. The CCR Rule is located in Title 40 Code of Federal Regulations Parts 257 and 261. The CCR Rule will regulate the disposal of CCR, including coal ash and gypsum, as non-hazardous solid waste at active generating power plants. The CCR Rule includes minimum criteria for active and inactive surface impoundments containing CCR and liquids, lateral expansions of existing units, and active landfills ("CCR Unit"). Failure to meet the minimum criteria can result in the mandated closure of a CCR Unit. The new criteria will apply to CCR Units at Gulf's Plants Crist, Smith and Daniel. Each plant will conduct engineering evaluations to meet the requirements for continued use of its CCR Units. Those CCR Units that do not meet the new CCR Rule requirements must initiate closure pursuant to the CCR Rule. Proposed activities include engineering evaluations, operation and closure plans development, monitoring well installation and monitoring, and CCR Unit closure if required. In addition, pursuant to its authority granted under the Clean Water Act, the FDEP issues National Pollutant Discharge Elimination System ("NPDES") permits for each of Gulf's generating facilities. A draft renewal NPDES permit for Plant Scholz was issued on August 24, 2015 and is expected to become final in the fourth quarter of 2015. This renewal permit has new conditions
requiring closure of the Plant Scholz CCR impoundment. These new conditions require Gulf to submit a closure plan for the Plant Scholz CCR impoundment to the FDEP. Engineering related to developing that closure plan has begun and is scheduled to be completed in 2016. Once the closure plan is approved by the FDEP, Gulf will commence closure of the CCR Unit at Plant Scholz.

The CCR project meets the criteria for cost recovery established by the Commission in Order No. PSC-94-0044-FOF-EI in that the costs associated with it are not recovered through any other cost recovery mechanism or through base rates and will be incurred after April 13, 1993. In addition, Gulf's compliance with the new CCR Rule and new NPDES permit conditions is legally mandated under a governmentally imposed environmental regulation. The capital expenditures associated with this project are projected to be $\$ 9,359,600$ in 2016. During 2015 and 2016, Gulf projects a total of $\$ 13,240,000$ in O\&M expenses for CCR compliance activities. The costs associated with this project will be allocated to the rate classes on a demand basis.

## (b.) Steam Electric Effluent Limitations Guidelines ("ELG") project: The

 Steam Electric Effluent Limitations Guidelines are required by Title 40 of the Code of Federal Regulations, Part 423. This regulation limits the discharge of pollutants into navigable waters and into publically owned treatment works by existing and new sources of steam electric power. The EPA is required to finalize revisions to the ELG by September 30, 2015. These new revisions would require the installation of additional controls such as wastewater treatment systems and/or dry ash handling systems at Gulf's generating facilities. During the 2015-2016 timeframe, Gulf plans to complete water balance and design studies to further evaluate the impact of the proposed ELG regulatory options. The project costs will be booked to apreliminary design and investigation account (deferred debit) until the rule is finalized and Gulf determines the best option to comply with the regulation.
(c.) The remaining activities/projects discussed in the projection testimony of Mr. Vick, filed herewith, are expansions or continuations of existing Commission-approved programs and are incorporated herein by reference.

## ENVIRONMENTAL COST RECOVERY FACTORS

(8) The calculated environmental cost recovery factors by rate class, including trueup, are:
$\left.\begin{array}{|c|c|}\hline \text { RATE } & \begin{array}{c}\text { ENVIRONMENTAL COST } \\ \text { RECOVERY FACTORS } \\ \text { CLASS }\end{array} \\ \hline \text { RS, RSVP, RSTOU }\end{array}\right] 2.109$

WHEREFORE, Gulf Power Company respectfully requests the Commission to approve the final environmental cost recovery true-up amounts for the period January 2014 through December 2014; estimated environmental cost recovery true-up amounts for the period January 2015 through December 2015; the projected environmental cost recovery amounts for the period

January 2016 through December 2016; the reasonableness and prudence of new and/or expansions of other environmental projects consistent with this petition; and the environmental cost recovery factors to be applied in customer billings beginning with the period January 2016 through December 2016.

Dated the $\underline{28 \text { th }}$ day of August, 2015.
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# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION 

ENVIRONMENTAL COST RECOVERY CLAUSE DOCKET NO. 150007-EI

PREPARED DIRECT TESTIMONY AND EXHIBIT OF JAMES O. VICK

PROJECTION FILING FOR THE PERIOD

JANUARY 2016 - DECEMBER 2016
August 31, 2015


A SOUTHERN COMPANY

## GULF POWER COMPANY

Before the Florida Public Service Commission
Prepared Direct Testimony and Exhibit of
James O. Vick
Docket No. 150007-EI
Date of Filing: August 31, 2015
Q. Please state your name and business address.
A. My name is James O. Vick, and my business address is One Energy Place, Pensacola, Florida, 32520.
Q. By whom are you employed and in what capacity?
A. I am employed by Gulf Power Company as the Director of Environmental Affairs.
Q. Mr. Vick, will you please describe your education and experience?
A. I graduated from Florida State University, Tallahassee, Florida, in 1975 with a Bachelor of Science Degree in Marine Biology. I also hold a Bachelor's Degree in Civil Engineering from the University of South Florida in Tampa, Florida. In addition, I have a Master of Science Degree in Management from Troy State University, Pensacola, Florida. I joined Gulf Power Company in August 1978 as an Associate Engineer. I have since held various engineering positions with increasing responsibilities such as Air Quality Engineer, Senior Environmental Licensing Engineer, and Manager of Environmental Affairs. In 2003, I assumed my present position as Director of Environmental Affairs.
Q. What are your responsibilities with Gulf Power Company?
A. As Director of Environmental Affairs, my primary responsibility is overseeing the activities of the Environmental Affairs section to ensure the Company is, and remains, in compliance with environmental laws and regulations, i.e., both existing laws and such laws and regulations that may be enacted or amended in the future. In performing this function, I have the responsibility for numerous environmental activities.
Q. Are you the same James O . Vick who has previously testified before this Commission on various environmental matters?
A. Yes.
Q. Mr. Vick, what is the purpose of your testimony?
A. The purpose of my testimony is to support Gulf Power Company's projection of environmental compliance costs recoverable through the Environmental Cost Recovery Clause (ECRC) for the period from January 2016 through December 2016, including two new environmental programs.
Q. Have you prepared an exhibit that contains information to which you will refer in your testimony?
A. Yes, my exhibit consists of the Coal Combustion Residual (CCR) regulation, the draft Plant Scholz National Pollutant Discharge Elimination System (NPDES) industrial wastewater permit, and the proposed Steam Electric Power Effluent Limitations Guidelines and Standards (ELG) regulation.

Counsel: We ask that Mr. Vick's exhibit consisting of three documents be marked as Exhibit No. $\qquad$ (JOV-1).
Q. Mr. Vick, please identify the capital projects included in Gulf's ECRC projection filing.
A. The environmental capital projects for which Gulf seeks recovery through the ECRC are described in Schedules 3P, 4P, and 5P of Witness Boyett's Exhibit CSB-3. I am supporting the expenditures, clearings, retirements, salvage and cost of removal currently projected for each of these projects. Mr. Boyett compiled these schedules and has calculated the associated revenue requirements for Gulf's requested recovery. Of the projects shown on Mr. Boyett's schedules, there are four programs that were previously approved by the Commission with activities that have projected capital expenditures during 2016. These programs include: Continuous Emission Monitoring Systems (CEMS) - Plants Crist, Scholz, Smith, and Daniel, Smith Water Conservation, Crist FDEP Agreement for Ozone Attainment, and the Air Quality Compliance program.
Q. Have all of the projects addressed in Gulf's testimony and exhibits been previously approved by the Commission?
A. No. Gulf is including two new Water Quality programs, the Coal Combustion Residual (CCR) program and the Steam Electric Power Effluent Limitations Guidelines (ELG) program, in addition to the programs previously approved by the Commission.
Q. Mr. Vick, please describe the Coal Combustion Residual program that Gulf seeks to recover through the ECRC.
A. The new program is related to the regulation of Coal Combustion Residuals by the United States Environmental Protection Agency (EPA) and the Florida Department of Environmental Protection (FDEP). For Gulf's generating plants, these new regulatory compliance obligations are pursuant to either the new CCR rule adopted earlier this year or in new permit requirements added by FDEP; through National Pollutant Discharge Elimination System (NPDES) permits issued for each of Gulf's generating facilities pursuant to authority granted under the Clean Water Act.

On April 17, 2015 EPA published the final CCR rule in the Federal register regulating CCR disposal under Subtitle D of the Resource Conservation and Recovery Act (RCRA). The CCR rule is located in Title 40 Code of Federal Regulations (CFR) Parts 257 and 261 (See Exhibit JOV-1). The CCR rule regulates the disposal of CCR, including coal ash and gypsum, as nonhazardous solid waste at active generating power plants. The CCR rule includes minimum criteria for active and inactive surface impoundments containing CCR and liquids, lateral expansions of existing units, and active landfills (collectively referred to as "CCR Units"). Failure to meet the minimum criteria can result in the mandated closure of a CCR Unit. The new criteria will apply to CCR Units at Gulf's Plants Crist, Smith, and Daniel.

A draft NPDES renewal permit for Plant Scholz (FL0002283) was issued on August 24, 2015 and is expected to become final in the fourth quarter of

2015 (See Exhibit JOV-1). This permit renewal has new conditions requiring closure of the Plant Scholz CCR Unit. Pursuant to the permit, the closure plan is required to be submitted to the FDEP in 2016 for review and approval. Once approved, Gulf will move forward with activities required for closure. The expenses associated with the Plant Scholz CCR Unit will be reflected in Operation and Maintenance (O\&M) Line Item 1.23.

Each plant will conduct engineering evaluations to meet the requirements for continued use of its CCR Units. By the effective date of the CCR rule, October 19, 2015, any CCR Unit subject to the EPA's new rule must have a publicly available website established, weekly and monthly inspections initiated, and a fugitive dust plan prepared. During 2015, Gulf is also required to install permanent markers at all CCR ponds and have annual inspections of the CCR impoundments and landfills performed by a professional engineer (PE). In 2016, Gulf will prepare closure and postclosure care plans for the CCR Units, conduct hydrologic and hydraulic capacity studies of the CCR ponds, compile a history of the structural integrity reports and design information for the CCR Units, prepare stormwater management plans, and conduct annual dust control and engineering inspections as well as groundwater monitoring. Costs associated with these activities are O\&M expenses that are reflected on Line Item 1.23 of Mr. Boyett's Schedule 2P.

Gulf's projected 2015 CCR capital expenditures of $\$ 660,000$ include installation of additional groundwater monitoring systems required for Plant

Crist, Plant Smith, and Plant Daniel. The proposed 2016 capital expenditures totaling $\$ 9,359,600$ are associated with the installation of a new bottom ash handling system for Plant Crist, dust suppression control equipment for Plant Smith, as well as new CCR wastewater management systems for Plant Crist and Plant Smith (Line Item 1.28).
Q. Mr. Vick, please discuss the new Steam Electric Power Effluent Limitations Guidelines and Standards (ELG) program.
A. EPA is required to establish new ELG which are found in Title 40 of the Code of Federal Regulations, Part 423 (See Exhibit JOV-1). This regulation limits the discharge of pollutants into navigable waters and into publically owned treatment works by existing and new sources of steam electric power. The EPA is required to finalize revisions to the ELG by September 30, 2015. The proposed ELG regulations, as currently drafted, would require the installation of additional controls such as wastewater treatment systems and/or dry ash handling systems at Gulf's generating facilities. The ultimate impact of these proposed regulations will, however, depend on the specific requirements of the final rule, which could require short compliance timeframes to complete modifications.

During the 2015-2016 timeframe Gulf plans to complete water balance and engineering studies to evaluate further the impact of the proposed ELG regulatory options. The project costs will be recorded to a preliminary design and investigation account (deferred debit) until the rule is finalized and Gulf has determined the best option to comply with the regulation.
Q. Mr. Vick, please describe the projected 2016 capital expenditures for CEMS - Plants Crist, Scholz, Smith and Daniel (Line Item 1.5).
A. Gulf plans to relocate existing Plant Crist CEMS monitors that are currently located in bypass stacks to the individual unit's duct and to upgrade Plant Crist Unit 7 flue gas monitors. The CEMS monitors need to be relocated and upgraded due to the Mercury and Air Toxics Standards (MATS) rule requirements. Expenditures associated with these activities reflected in the 2016 projection filing are $\$ 3.1$ million.
Q. Mr. Vick, please provide an update on the Smith Water Conservation project (Line Item 1.17).
A. As discussed in previous filings, Gulf has determined that it is feasible to inject reclaimed water into the Plant Smith deep injection well system. Gulf has installed three deep injection wells and will begin the process of installing piping and initial equipment for the pump station during the latter portion of 2015 and the first part of 2016. During 2016, Gulf will obtain additional operational data required to design the final pump station and wastewater treatment equipment as well as any additional piping. Expenditures associated with these activities reflected in the 2016 projection filing are $\$ 340,807$.
Q. Mr. Vick, please describe the projects included in the 2016 projection for (Line Item 1.19) the Crist FDEP Agreement for Ozone Attainment.
A. Gulf plans to add or replace a layer of the Plant Crist Unit 7 SCR catalyst and install the Plant Crist Unit 6 flame scanner during 2016. In 2016, the
effectiveness of the existing catalyst will have reached a point requiring either a replacement layer or the addition of another layer. Under either option, the replacement or additional layer will be a regenerated catalyst. The projected 2016 expenditures for this line item are $\$ 1,183,284$.
Q. Mr. Vick, please describe the projected 2016 capital expenditures for the Air Quality Compliance program (Line Item 1.26).
A. The projected 2016 expenditures for this line item include completion of the work associated with the Plant Daniel scrubbers and CEMS equipment needed for Plant Crist and Plant Daniel to comply with the MATS regulation. Also, projected for this line item are capital retrofit projects for the Plant Crist scrubber. Gulf plans to replace Plant Crist's scrubber booster fan hubs, scrubber mist eliminator, and scrubber expansion joints, as well as increase the capacity of its scrubber wastewater treatment plant. The projected 2016 expenditures for this line item is $\$ 16,338,205$.
Q. Mr. Vick, please provide an update on the status of the Plant Daniel scrubber projects?
A. The Plant Daniel scrubber projects are currently scheduled for completion in the October to November 2015 time period. On August 19, 2015, the Plant Daniel Unit 1 scrubber had its initial gas flow. That activity initiated approximately 60 days of testing and optimization. The Unit 2 scrubber initial gas flow is planned for September, 2015. After the testing and optimization, the scrubbers will be drained and inspected prior to placing the scrubbers in-service. Other remaining major activities include
commissioning all ancillary equipment, completing the waste water treatment system and finishing the liner at the gypsum storage area. The total projected amount for 2016 for Daniel scrubber expenditures is $\$ 8.5$ million which is included in the $\$ 16.3$ million of expenditures projected for the Air Quality Compliance Program, Line Item 1.26.
Q. Please discuss the status of the MATS rule and the controls and monitoring equipment needed to comply with the MATS regulations.
A. On June 29, 2015, the Supreme Court decided that the EPA interpreted the Clean Air Act unreasonably when it deemed cost irrelevant to the decision of whether regulation of power plants under section 112 of the Clean Air Act is "appropriate and necessary". While the Court directed that the EPA must consider cost before deciding whether regulation of power plants is "appropriate and necessary", the Court left it up to EPA to decide how to account for cost upon remand. The MATS regulations remain in effect and the EPA announced it intends to submit its cost analysis by spring 2016.

Gulf Power began installing MATS monitoring systems at Plant Crist in 2014 and Plant Daniel in 2015 in order to comply with the MATS rule. The Plant Crist MATS monitoring system will monitor mercury and particulate emissions. Mercury monitors were included in Gulf's original Compliance Plan that was filed on March 29, 2007. The Plant Daniel and Plant Crist mercury monitors were two of the 10 specific components of Gulf's program that were agreed to as part of a stipulation approved on August 14, 2007. The stipulation is included in Order No. PSC-07-0721-S-EI. The 2016
projected expenditures for the Plant Crist MATS monitoring systems are $\$ 3.2$ million. The Plant Daniel MATS monitoring costs are included in the cost projection for the Plant Daniel scrubbers.
Q. Mr. Vick, are you including the purchase of allowances in your 2016 projection filing?
A. No, we are not currently projecting the need to purchase additional allowances during 2016.
Q. How do the projected Environmental O\&M activities listed on Schedule 2P of Mr. Boyett's Exhibit CSB-3 compare to the O\&M activities approved for cost recovery in past ECRC proceedings?
A. All of the O\&M activities listed on Schedule 2P have been approved for recovery through the ECRC in past proceedings other than the Coal Combustion Residual (CCR) program expenses (Line Item 1.23).
Q. Please describe the O\&M activities included in the air quality category for 2016.
A. There are five $O \& M$ activities included in the air quality category that have projected expenses in 2016. On Schedule 2P, Air Emission Fees (Line Item 1.2), represents the expenses projected for the annual fees required by the Clean Air Act Amendments (CAAA) of 1990 that are payable to the FDEP and Mississippi Department of Environmental Quality. The expenses projected for the 2016 recovery period total $\$ 560,352$.

Included in the air quality category, Title V (Line Item 1.3) represents projected ongoing expenses associated with implementation of the Title $V$ permits. The total 2016 estimated expenses for the Title V Program are \$144,489.

On Schedule 2P, Asbestos Fees (Line Item 1.4) consists of the fees required to be paid to the FDEP for asbestos abatement projects. The projected expenses for this line item are $\$ 1,000$.

Emission Monitoring (Line Item 1.5) on Schedule 2P reflects an ongoing O\&M expense associated with the Continuous Emission Monitoring equipment as required by the CAAA. These expenses are incurred in response to EPA's requirements that the Company perform Quality Assurance/Quality Control (QA/QC) testing for the CEMS, including Relative Accuracy Test Audits (RATAs) and Linearity Tests. The expenses expected to be incurred during the 2016 recovery period for these activities total \$816,217.

The FDEP NOx Reduction Agreement (Line Item 1.19) includes O\&M costs associated with the Plant Crist Unit 7 SCR and the Plant Crist Units 4 and 5 Selective Non-Catalytic Reduction (SNCR) projects that were included as part of the 2002 agreement with FDEP. This line item includes the cost of anhydrous ammonia, urea, air monitoring, and general O\&M expenses related to activities undertaken in connection with the agreement. Gulf was granted approval for recovery of the costs incurred to complete these
activities in FPSC Order No. PSC-02-1396-PAA-El in Docket No. 020943El. The projected expenses for the 2016 recovery period total $\$ 952,387$.
Q. What O\&M activities are included in the water quality category?
A. General Water Quality (Line Item 1.6), identified in Schedule 2P, includes costs associated with Soil Contamination Studies, NPDES permit compliance, Dechlorination, Groundwater Monitoring, Surface Water Studies, the Cooling Water Intake Program, the Impaired Waters Rule, the Impoundment Integrity Program, and Stormwater Maintenance. The expenses expected to be incurred during the projection period for this line item totals \$2,009,676.
Q. What other $\mathrm{O} \& \mathrm{M}$ activities are included in the water quality category?
A. Groundwater Contamination Investigation (Line Item 1.7) was previously approved for environmental cost recovery in Docket No. 930613-EI. This line item includes expenses related to substation investigation and remediation activities. Gulf has projected $\$ 3,437,656$ of incremental expenses for this line item during the 2016 recovery period.

Line Item 1.8, State National Pollutant Discharge Elimination System (NPDES) Administration, was previously approved for recovery in the ECRC and reflects expenses associated with NPDES annual fees and permit renewal fees for Gulf's three generating facilities in Florida. These expenses are expected to be $\$ 36,500$ during the projected recovery period.

Line Item 1.9, Lead and Copper Rule, was also previously approved for ECRC recovery and reflects sampling, analytical, and chemical costs related to the lead and copper drinking water quality standards. These expenses are expected to total $\$ 16,974$ during the 2016 projection period.

Line Item 1.23, is the new Coal Combustion Residual (CCR) program that was previously discussed on pages 4 through 6 . Gulf is requesting ECRC recovery for certain CCR compliance activities that will be conducted beginning in 2015. The projected 2015 and 2016 CCR O\&M expenses are $\$ 13.24$ million.
Q. What activities are included in the environmental affairs administration category?
A. Only one O\&M activity is included in this category on Schedule 2P (Line Item 1.10) of Mr. Boyett's Exhibit CSB-3. This line item refers to the Company's Environmental Audit/Assessment function. This program is an on-going compliance activity previously approved for ECRC recovery. Expenses totaling \$9,000 are expected during the 2016 recovery period.
Q. What O\&M activities are included in the General Solid and Hazardous Waste category?
A. The General Solid and Hazardous Waste activity (Line Item 1.11) involves the proper identification, handling, storage, transportation, and disposal of solid and hazardous wastes as required by federal and state regulations. The program includes expenses for Gulf's generating and power delivery
facilities. This program is a previously approved program that is projected to incur incremental expenses totaling \$771,232 in 2016.
Q. Are there any other O\&M activities that have been approved for recovery that have projected expenses?
A. There are five other O\&M activities that have been approved in past proceedings which have projected expenses during 2016. They are the Above Ground Storage Tanks program, the Sodium Injection System, the Air Quality Compliance Program, Crist Water Conservation, and Emission Allowances.
Q. What O\&M activities are included in the Above Ground Storage Tanks line item?
A. Above Ground Storage Tanks (Line Item 1.12) includes maintenance activities and fees required by Florida's above ground storage tank regulation, Chapter 62 Part 762, F.A.C. Expenses totaling \$164,181 are projected to be incurred during 2016.
Q. What activity is included in the Sodium Injection line item?
A. The Sodium Injection System (Line Item 1.16) was originally approved for inclusion in the ECRC in Order No. PSC-99-1954-PAA-EI. The activities in this line item involve sodium injection to the coal supply that enhances precipitator efficiencies when burning certain low sulfur coals at Plant Crist and Plant Smith. Expenses totaling $\$ 72,800$ are projected to be incurred during 2016 for this line item.
Q. What activities are included in the Air Quality Compliance Program (Line Item 1.20)?
A. This line item includes O\&M expenses associated with the capital projects approved for ECRC recovery under the Air Quality Compliance Program. This line item includes the cost of anhydrous ammonia, hydrated lime, urea, limestone and general O\&M expenses. The projected 2016 expenses for this line item total approximately $\$ 27.1$ million which includes $\$ 9.5$ million for limestone costs associated with operation of the Plant Crist and Plant Daniel scrubbers.
Q. What activities are included in the Crist Water Conservation line item (Line Item 1.22)?
A. The Crist Water Conservation line item includes general O\&M expenses associated with the Plant Crist reclaimed water system, such as piping, valve maintenance and pump replacements. Expenses totaling \$570,300 are projected to be incurred during 2016 for this line item.
Q. Please describe the emission allowance line item (Line Item 1.27).
A. This line item includes projected allowance expenses for Gulf's generation. Line Item 1.27 includes $\$ 226,209$ of projected expenses for $\mathrm{SO}_{2}$ allowances during 2016.
Q. Do each of the capital projects and O\&M activities that have projected costs in 2016 meet the ECRC statutory guidelines?
A. Yes. The projects included in Gulf's 2016 ECRC projection filing meet the requirements of the ECRC statute and are consistent with the Commission's precedents regarding environmental cost recovery. Each of the capital projects and O\&M activities set forth in Mr. Boyett's schedules include only prudent costs that are not recovered through some other cost recovery mechanism or base rates. The projected environmental costs are necessary to achieve and/or maintain compliance with environmental laws, rules, and regulations.
Q. Mr. Vick, does this conclude your testimony?
A. Yes.

## AFFIDAVIT

## STATE OF FLORIDA ) COUNTY OF ESCAMBIA )

Before me, the undersigned authority, personally appeared James O. Nick, who being first duly sworn, deposes and says that he is the Director of Environmental Affairs of Gulf Power Company, a Florida corporation, that the foregoing is true and correct to the best of his knowledge and belief. He is personally known to me.


Sworn to and subscribed before me this $27^{h}$ day of Qugceot, 2015.


Notary Public, State of Florida at Large

Exhibit JOV-1
See DVD Labeled
Docket No. 150007-EI
Electronic Exhibit JOV-1

# BEFORE THE FLORIDA PUBLIC SERVICE COMMISSION 

ENVIRONMENTAL COST RECOVERY CLAUSE

DOCKET NO. 150007-EI

PREPARED DIRECT TESTIMONY AND EXHIBIT OF<br>C. SHANE BOYETT

PROJECTION FILING<br>FOR THE PERIOD

JANUARY 2016 - DECEMBER 2016
August 31, 2015


A SOUTHERN COMPANY

## GULF POWER COMPANY

Before the Florida Public Service Commission Prepared Direct Testimony and Exhibit of
C. Shane Boyett

Docket No. 150007-El
Date of Filing: August 31, 2015
Q. Please state your name, business address and occupation.
A. My name is Shane Boyett. My business address is One Energy Place, Pensacola, Florida 32520. I am the Supervisor of Regulatory and Cost Recovery at Gulf Power Company.
Q. Please briefly describe your educational background and business experience.
A. I graduated from the University of Florida in Gainesville, Florida in 2001 with a Bachelor of Science degree in Business Administration. I also hold a Master of Business Administration from the University of West Florida in Pensacola, Florida. I joined Gulf Power in 2002 as a Forecasting Specialist where I worked for five years until I took a position in the Regulatory and Cost Recovery area in 2007 as a Regulatory Analyst. After working in the Regulatory and Cost Recovery department for seven years, I transferred to Gulf Power's Financial Planning department as a Financial Analyst where I worked until being promoted to my current position of Supervisor of Regulatory and Cost Recovery. My responsibilities include supervision of: tariff administration, calculation of cost recovery factors, and the regulatory filing function of the Regulatory and Cost Recovery department.
Q. What is the purpose of your testimony?
A. The purpose of my testimony is to present both the calculation of the revenue requirements and the development of the environmental cost recovery factors for the period of January 2016 through December 2016.
Q. Have you prepared any exhibits that contain information to which you will refer in your testimony?
A. Yes, I have. My exhibit consists of 8 schedules, each of which was prepared under my direction, supervision, or review.

Counsel: We ask that Mr. Boyett's exhibit consisting of eight schedules be marked as Exhibit No. $\qquad$ (CSB-3).
Q. What environmental costs is Gulf requesting recovery of through the Environmental Cost Recovery Clause (ECRC)?
A. As discussed in the testimony of Witness James O. Vick, Gulf is requesting recovery for certain environmental compliance operating expenses and capital costs that are consistent with both the decision of the Commission in Order No.PSC-94-0044-FOF-El in Docket No. 930613El and with past proceedings in this ongoing recovery docket. The costs we have identified for recovery through the ECRC are not currently being recovered through base rates or any other cost recovery mechanism.
Q. How was the amount of projected Operations and Maintenance (O\&M) expenses to be recovered through the ECRC calculated?
A. Mr. Vick has provided me with projected recoverable O\&M expenses for January 2016 through December 2016. Schedule 2P of Exhibit CSB-3 shows the calculation of the recoverable O\&M expenses broken down between demand-related and energy-related expenses. Schedule 2P also provides the appropriate jurisdictional factors and amounts related to these expenses. All O\&M expenses associated with compliance with air quality environmental regulations were considered to be energy-related, consistent with Commission Order No. PSC-94-0044-FOF-EI. The remaining expenses were broken down between demand and energy consistent with Gulf's last approved cost-of-service methodology in Docket No. 110138-EI.
Q. Please describe Schedules 3 P and 4 P of your Exhibit CSB-3.
A. Schedule 3P summarizes the monthly recoverable revenue requirements associated with each capital investment project for the recovery period. Schedule 4P shows the detailed calculation of the revenue requirements associated with each investment project. These schedules also include the calculation of the jurisdictional amount of recoverable revenue requirements. Mr. Vick has provided me with the expenditures, clearings, retirements, salvage, and cost of removal related to each capital project as well as the monthly costs for emission allowances. From that information, plant-in-service and construction work in progress (non-interest bearing) was calculated. Additionally, depreciation, amortization and dismantlement expense and the associated accumulated depreciation balances were calculated based on Gulf's approved depreciation rates,
amortization periods, and dismantlement accruals. The capital projects identified for recovery through the ECRC are those environmental projects which were not included in the test year on which present base rates were set.
Q. How was the amount of property taxes to be recovered through the ECRC derived?
A. Property taxes were calculated by applying the applicable tax rate to taxable investment. In Florida, pollution control facilities are taxed based only on their salvage value. For the recoverable environmental investment located in Florida, the amount of property taxes is estimated to be $\$ 0$. In Mississippi, there is no such reduction in property taxes for pollution control facilities. Therefore, property taxes related to recoverable environmental investment at Plant Daniel are calculated by applying the applicable millage rate to the assessed value of the property.
Q. What capital structure and return on equity were used to develop the rate of return used to calculate the revenue requirements as shown on 8 P ?
A. Consistent with Commission Order No. PSC-12-0425-PAA-EU dated August 16, 2012 in Docket No. 120007-El, the capital structure used in calculating the rate of return for recovery clause purposes is based on the weighted average cost of capital (WACC) presented in Gulf's May 2015 Earnings Surveillance Report. This rate of return used to calculate ECRC revenue requirements includes a return on equity of 10.25 percent for the period January 1, 2016 through December 31, 2016.
Q. How has the breakdown between demand-related and energy-related investment costs been determined in the past?
A. Consistent with Commission Order No. PSC-13-0606-FOF-EI dated November 19, 2013 in Docket No. 130007-EI, investment costs recoverable through ECRC were broken down within the retail jurisdiction based on the $12-\mathrm{MCP}$ and $1 / 13^{\text {th }}$ energy allocator. The use of this allocator is consistent with cost-of-service studies approved in Gulf's prior base rate cases. The calculation of this breakdown is shown on Schedule 4P and summarized on Schedule 3P.
Q. What is the total amount of projected recoverable costs related to the period January 2016 through December 2016 ?
A. The total projected jurisdictional recoverable costs for the period January 2016 through December 2016 is $\$ 197,765,402$ as shown on line 1c of Schedule 1P of Exhibit CSB-3. This includes costs related to O\&M activities of $\$ 48,094,205$ and costs related to capital projects of $\$ 149,671,197$ as shown on lines 1a and 1b of Schedule 1P.
Q. What is the total recoverable revenue requirement to be recovered in the projection period January 2016 through December 2016 and how was it allocated to each rate class?
A. The total recoverable revenue requirement including revenue taxes is \$200,521,584 for the period January 2016 through December 2016 as shown on line 5 of Schedule 1P of Exhibit CSB-3. This amount includes the recoverable costs related to the projection period and the total true-up
cost of $\$ 2,611,911$ to be collected. Schedule 1 P also summarizes the energy and demand components of the requested revenue requirement. These amounts are allocated by rate class using the appropriate energy and demand allocators as shown on Schedules 6P and 7P of Exhibit CSB-3.
Q. Is this data and information presented from the books and records of Gulf Power and kept in accordance with generally accepted accounting principles and practices, and with the provisions of the Uniform System of Accounts as prescribed by this Commission?
A. Yes.
Q. How were the allocation factors calculated for use in the Environmental Cost Recovery Clause?
A. The demand allocation factors used in the ECRC were calculated using the 2012 load data filed with the Commission in accordance with FPSC Rule 25-6.0437. The energy allocation factors were calculated based on projected kWh sales for the period adjusted for losses. The calculation of the allocation factors for the period is shown in columns one through nine on Schedule 6P of Exhibit CSB-3.
Q. How were these factors applied to allocate the requested recovery amount properly to the rate classes?
A. As I described earlier in my testimony, Schedule 1P of Exhibit CSB-3 summarizes the energy and demand portions of the total requested
revenue requirement. The energy-related recoverable revenue requirement of $\$ 41,172,439$ for the period January 2016 through December 2016 was allocated using the energy allocator, as shown in column three on Schedule 7P of Exhibit CSB-3. The demand-related recoverable revenue requirement of $\$ 159,349,145$ for the period January 2016 through December 2016 was allocated using the demand allocator, as shown in column four on Schedule 7P. The energy-related and demand-related recoverable revenue requirements are added together to derive the total amount assigned to each rate class, as shown in column five.
Q. What is the monthly amount related to environmental costs recovered through this factor that will be included on a residential customer's bill for $1,000 \mathrm{kWh}$ ?
A. The environmental costs recovered through the clause from the residential customer who uses $1,000 \mathrm{kWh}$ will be $\$ 21.09$ monthly for the period January 2016 through December 2016.
Q. When does Gulf propose to collect its environmental cost recovery charges?
A. The factors will be effective beginning with Cycle 1 billings in January 2016 and will continue through the last billing cycle of December 2016.
Q. Mr. Boyett, does this conclude your testimony?
A. Yes.

## AFFIDAVIT

STATE OF FLORIDA )
Docket No. 150007-EI
COUNTY OF ESCAMBIA )

Before me, the undersigned authority, personally appeared C. Shane Boyett, who being first duly sworn, deposes and says that he is the Supervisor of Regulatory and Cost Recovery of Gulf Power Company, a Florida corporation, that the foregoing is true and correct to the best of his knowledge and belief. He is personally known to me.


Sworn to and subscribed before me this $27^{\text {th }}$ day of auguot, 2015.


Notary Public, State of Florida at Large

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
Total Jurisdictional Amount to be Recovered

For the Projected Period
January 2016 - December 2016

| Line <br> No. |  | $\begin{gathered} \text { Energy } \\ (\$) \\ \hline \end{gathered}$ | $\begin{aligned} & \text { Demand } \\ & (\$) \\ & \hline \end{aligned}$ | Total $(\$)$ |
| :---: | :---: | :---: | :---: | :---: |
| Total Jurisdictional Rev. Req. for the projected period |  |  |  |  |
|  | a Projected O \& M Activities (Schedule 2P, Lines 7, 8 \& 9) | 29,090,992 | 19,003,213 | 48,094,205 |
|  | b Projected Capital Projects (Schedule 3P, Lines 7, 8 \& 9) | 11,529,442 | 138,141,755 | 149,671,197 |
|  | c Total Jurisdictional Rev. Req. for the projected period (Lines 1a + 1b) | 40,620,434 | 157,144,968 | 197,765,402 |
| 2 | True-Up for Estimated Over/(Under) Recovery for the period January 2015 - December 2015 |  |  |  |
|  | (Schedule 1E, Line 3) | $(339,826)$ | $(1,359,302)$ | $(1,699,128)$ |
| 3 | Final True-Up for the period January 2014 - December 2014 (Schedule 1A, Line 3) | $(182,557)$ | $(730,226)$ | $(912,783)$ |
| 4 | Total Jurisdictional Amount to be Recovered/(Refunded) in the projection period January 2016 - December 2016 (Line 1c-Line 2 -Line 3) | $\underline{41,142,816}$ | 159,234,496 | 200,377,313 |
| 5 | Total Projected Jurisdictional Amount Adjusted for Taxes (Line $4 \times$ Revenue Tax Multiplier) | $\underline{\underline{41,172.439}}$ | 159,349,145 | $\underline{200.521 .584}$ |

## Notes:

Allocation to energy and demand in each period are in proportion to the respective period split of costs indicated on Lines 7 \& 8 of Schedules 5E \& 7E and 5A \& 7A.
Gulf Power Company
nental Cost Recovery Chus
Environumental Cost Recovery Chuse (ECRC) Jumuary 2016 - Deceember 2016

## O\&M Activities

(in Dollars)
Live

```
1 Description of O& M Activities
    M
    T Tille V
    Asbestos Fecs
    Emission Monitroring
    Gencral Water Qusily
    Starc NPDES Admministation
    Lend and Copper Rule
    10 Env Auditing/Assessmem
    11 General Solid & Hazurdous Waste
    12 Above Ground Storage Tanks
    13 Low NOx
    Ash Pond Diversion Currains
    S Mercury Emission
    .17 Gulf Coast Ozone Sudy
    18 SPCC Substation Project
    19 FDEP NOX Reduciom Agreemen
    20 Air Quality Compliance Program
    21 MACTICR
    23 Crist Waler Conscrvation
    24 Mercury Albwances
    25 Annual NOx Allownnces
    26 Seasunal NOx Allowarces
    27 SO2 Albwrances
```










Irnjected

0
0
10,513
1,060
58,452
143,370
27,818
34,667
1,414
0
58,046
35,419
0
0
0
5,096
0
0
74,007
$2,104,526$
0
16,510
230,000
0
0
0 Trojected esbuary Ma Projecte
Mach

Projected
Ancil





Projected
Projectrd
Sentember $\begin{gathered}\text { Projecte } \\ \text { Oqtober }\end{gathered}$
Projecked
November
Projected
End of
Period Period
12-Mounh Method of Classification
Energy


$$
4,443,109
$$

$$
\frac{5,292,791}{3,177,716}-\frac{4,427,200}{2,336,295}-
$$

$$
\begin{array}{rl}
4.364,928 & 49 \\
\hline 2,299,891 & 29
\end{array}
$$

49,495,405
19.576 .512
29.918,886
3 Recoverable Costs Allocated to Energy
$\begin{array}{ll}3 & \text { Recoverable Costs Allocated to Energy } \\ 4 & \text { Recovernble Costs Allocated to Dernand }\end{array}$


$$
\begin{aligned}
& 2,236,153 \\
& 0.9722491
\end{aligned}
$$

$$
\begin{gathered}
2,299,891 \\
2,065,036 \\
0,9681922
\end{gathered}
$$

$$
\begin{aligned}
& \text { 29,918,886 } \\
& \text { 19,576.519 }
\end{aligned}
$$

5 Retail Enerey Juristiccionnal Factor


9 Total Juristictional Recoverable Cosis for O \& M Aclivitics ( (ines $7+8$ )
Noles:
(A) Line $3 \times$ Line $5 \times$ line loss muliplier
(B) Line $4 \times$ Line 6




Notes:
(A) Description and reasoa for 'OUleer' wedjusunents to net invesment for this project, if applicable.
B) Applicable beginning of period and end of perind depreciable base by production plant name(s), unit(s), or plant account(s).
(C) Descriplion of Adjusements to Reserve for Gross Salvage nnd Other Recoveries and Cost of Removal.
D) The equily component has been grossed up for taxes. The approved ROE is $10.25 \%$.
(E) Applicable depreciation rate or ratcs.
(G) Applicable amortization period.
(H) Line 9ax Line $10 \times 1.0015$ line loss multiplicr.
(1) Line $9 \mathrm{~b} \times$ line 11 .


## Nolcs:

(A) Description and reason for 'Other' adjustments to net investment for this project, if applicable.
(B) Applicable beginning of period and end of period depreciable base by production plant name(s), unit(s), or plant account(s).
(C) Description of Adjusiments to Rescrve for Gross salvage and Other Recoverics and Cost of Removal.
(1) The equity component has been grossed up for taxes. The approved ROE is $\mathbf{1 0 . 2 5 \%}$.
(E) Applicable depreciation rate or rales.
(F) Applicable amorization period.
(G) Description and reason for "Other" adjustments to investment expenses for this project.
(H) Line $9 \mathrm{a} \times$ Line $10 \times 1.0015$ line loss rnultiplier.
(I) Line $9 \mathrm{~b} \times$ Line 11 .


## Nos.

(B) Applicable beginging of
(C) Description of Adjusinnents to Reserve for Gross Salvage and Other Recoveries and Cost of Removal.
(D) The equity component has been grossed up for taxes. The approved ROE is $10.25 \%$.
(E) Applicable depreciation rate or rates.
(F) Portions of PE 1236 has a 7 -year amortization period.
(G) Description and reason for "Other" adjustments to invcstment expenses for this project
(H) Line $9 \times \times$ Linc $10 \times 1.0015$ line loss srultiplier.
(I) Line $9 \mathrm{~b} \times$ Line 11 .

Return on Capital Investments, Depreciation and Taxes
P.E. 1001, 1060, 1154, 1164, 1213, 1217, 1240, 1245, 1247, 1256, 1283, 1286, 1289, 1290, 1311, 1316, 1323, 1324, 1325, 1357, 1358, 1364, 1440, 1441, 1442, 1444, 1445, 1454, 1459, 1460, 1558, 1570, 1592, 1658, 1829, 1830

(A) Description and reason for 'Oilter' adjustments to net invesument tor this project, if applícable
(B) Beginning Balances: Crist $\$ 4,053,254$; Snitl $\$ 1,729,329$; Daniel $\$ \$ 84,373$. Ending Balances: Crist $\$ 7,088,807$; Smith $\$ 0$; Danicl $\$ 584,373$

(D) The equity component has been grossed up for taxes. The approved ROE is $10.25 \%$.
(F) Portions of PE 1283 has a 7 year amorization period. PEs $1364 \& 1658$ are fully amortixed.
(G) Description and reason for "Olles" adjustmenss to investment expenses lor this project.
(H) Line 9 a $\times$ Lime $10 \times 1.0015$ line loss multiplice
(I) Linc $9 \mathrm{~b} \times$ Line 11 .


Notes:
(A) Deseription and reason for 'Other' adjusuments to net investment for this project, if applicable.
(B) Applicable beginning of period and end of period depreciable base by production plant nanx(s), unit(s), or plant account(s)
(C) Descripion of Adjusmenis to Reserve for Gross Salvage and Other Recoverics and Cost of Renoval.
(D) The equity component has been grossed up for taxes. The approved ROE is $10.25 \%$.
(E) Applicable depreciation rate or rates.
(F) The ammrizable portion of PE 1007 is fully amorized.
(G) Description and reason for "Other" adjustunenis to investument expenses for this project.
(H) Line 9 ax Line $10 \times 1.0015$ line loss mulliplier.
(I) Line $9 \mathrm{~b} \times$ Line 11 .


14 Total Jurisdictional Recoverable Costs (Lines $12+13$ )
Notes:
(A) Description and reason for 'Other' adiustments to net investment for this project, if applicable.
(B) Beginning and Ending Balances: Crist $\$ 149,950$; Smith $\$ 93,023$.
(C) Description of Adjustments to Reserve for Gross Salvage and Other Recoveries and Cost of Renoval.
(D) The equily component has been grossed up for taxes. The approved ROE is $10.25 \%$.
(E) Applicable depreciation rate or rates.
(F) Applicable amonization period.
(G) Description and reason for "Other" adjustuments to investment expenses for tbis project.
(H) Line $9 \mathrm{a} \times$ Linc $10 \times 1.0015$ line hoss multiplier.
(1) Linc $9 \mathrm{~b} \times$ Linc 11 .

(A) Description and reason for Other' adjustiments to net investment for this project, if applicable.
(B) Applicable beginning of period and end of period depreciable base by produclion plant name(s), unit(s), or plant accountts).
(C) Descripuion of Adjustmenis io Reserve for Gross salvage and Oiner Recoverics and Cost of Removal.
(D) The equity component has been grossed up for taxcs. The approved ROE is $10.25 \%$,
(E) Applicable depreciation rate or ratcs.
(F) Applicable amortization period.
(G) Description and reason for "Ohber" adjustments to investencnt expenses for this project.
(H) Line $9 \mathrm{a} \times$ Line $10 \times 1.0015$ line loss maltiplicr.
(I) Line $9 \mathrm{~b} \times$ Line 11 .

Gulf Power Company
Environmental Cost Recovery Clause (ECRC)
Calculation of the Projected Period Amoun Jannary 2016 - December 2016

| Jamiary 2016 - December 2016 <br> Relum on Capital Investments, Depreciation and Taxes <br> For Project: Crist Dechlorination System <br> P.E.s 1180 \& 1248 <br> (in Dollars) |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| $\underline{\text { Line }}$ | Description | Beginning of Period Amount | Projected January | Projected February | Projected March | Projected April | Projected May | Projected Junc | Projected July | Projected nugusi | Projected September | Projected October | Projected November | Projected December | 12-Month Period Amount |
| 1 Investments |  |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | a Expendilures/Additions |  | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  |
|  | b Clearings to Plant |  | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  |
|  | c Reitirements |  | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  |
|  | d Cost of Removal |  | 0 | 0 | 0 | 0 |  | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  |
|  | c Salvage |  | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  |
| 2 | Plant-in-Service/Depreciation Base (B) | 380,697 | 380,697 | 380,697 | 380,697 | 380,697 | 380,697 | 380,697 | 380.697 | 380,697 | 380,697 | 380,697 | 380,697 | 380,697 |  |
| 3 | Less: Accumulated Depreciation (C) | (202,040) | (203, 151) | $(204,261)$ | $(205,372)$ | $(206,482)$ | $(207,593)$ | $(208,703)$ | $(209,814)$ | $(210,924)$ | $(212,035)$ | (213,145) | $(214,256)$ | (215,366) |  |
| 4 | CWIP - Non Interest Bearing | 0 | 0 | 0 | 0 | 0 | - | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  |
| 5 | Net Investment (Lines $2+3+4$ (A) | 178,657 | 177,546 | 176,436 | 175,325 | 174,215 | 173,104 | 171,994 | 170,883 | 169,773 | 168.662 | 167,552 | 166,441 | 165,331 |  |
| 6 | Average Net lnvestment |  | 178,101 | 176,991 | 175,880 | 174,770 | 173,659 | 172,549 | 171,438 | 170,328 | 169,217 | 168,107 | 166,996 | 165,886 |  |
| 7 | Return on Average Net Investment |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | a Equity Component (Line $6 \times$ Equity Componen $\times$ | $\times 1 / 12$ (D) | 967 | 961 | 955 | 949 | 943 | 937 | 931 | 925 | 919 | 913 | 907 | 901 | 11,209 |
|  | b Debt Component (Linc $6 \times$ Debt Component $\times 1$ | 1/2) | 247 | 246 | 244 | 243 | 241 | 239 | 238 | 236 | 235 | 233 | 232 | 230 | 2,865 |
| 8 | Invesument Expenses |  |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | a Depreciation (E) |  | 1,111 | 1,111 | 1,111 | 1,111 | 1,111 | 1,111 | 1,111 | 1,111 | 1,111 | 1,111 | 1,111 | 1,111 | 13,326 |
|  | b Amortization ( F ) |  | 0 | 0 | 0 |  | 0 | , | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
|  | c Dismandement |  | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |  | 0 | 0 |
|  | d Property Taxes |  | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
|  | e Other (G) |  | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | D |
| 9 | Total System Recoverable Expenses (Lines 7 +8) |  | 2.325 | 2,317 | 2.310 | 2,302 | 2,295 | 2,287 | 2,280 | 2,272 | 2,264 | 2,257 | 2.249 | 2,242 | 27,400 |
|  | a Recoverable Costs Allocated to Energy |  | 179 | 178 | 178 | 177 | 177 | 176 | 175 | 175 | 174 | 174 | 173 | 172 | 2,108 |
|  | b Recoverable Costs Allocated to Demand |  | 2.146 | 2,139 | 2,132 | 2,125 | 2,118 | 2,111 | 2,104 | 2,097 | 2,090 | 2,083 | 2.076 | 2,069 | 25,292 |
| 10 | Energy Jurisdictional Factor |  | 0.9682439 | 0.9694592 | 0.9702248 | 0.9711428 | 0.9716749 | 0.9723972 | 0.9724397 | 0.9719927 | 0.9722491 | 0.9712453 | 0.9696982 | 0.9681922 |  |
| 11 | Demand Jurisdietional Factor |  | 0.9707146 | 0.9707146 | 0.9707146 | 0.9707146 | 0.9707146 | 0.9707146 | 0.9707146 | 0.9707146 | 0.9707146 | 0.9707146 | 0.9707146 | 0.9707146 |  |
| 12 Retail Energy-Related Recoverable Cosis (H) |  |  | 173 | 173 | 173 | 172 | 172 | 171 | 171 | 170 | 170 | 169 | 168 | 167 | 2,049 |
| 13 | Rerail Demand-Reluted Recoverable Costs (i) |  | 2.083 | 2,076 | 2,070 | 2,063 | 2.056 | 2,049 | 2.043 | 2.036 | 2,029 | 2.022 | 2.015 | 2,009 | 24,552 |
|  | Total Jurisdictional Recoverable Costs (Lincs $12+13$ |  | 2.257 | 2.250 | 2.242 | 2,235 | 2.228 | 2,221 | 2,213 | 2,206 | 2,199 | 2,191 | 2,183 | 2,176 | 26,601 |

Notes:
(A) Description and reason for 'Other' adjustments to net investiment for tbis project, if applicable.
(B) Applicable beginning of period and end of period depreciable base by production plant name(s), unit(s), or plant account(s)
(C) Description of Adjustments to Rescrve for Gross Salvage and Other Recoveries and Cost of Remsval.
(D) The equity component has been grossed up for taxes. The approved ROE is $10.25 \%$.
(E) Applicable depreciation rate or rates.
(F) Applicuble amortization period.
(G) Description and reason for "Other" adjustuments to investment expenses for this project.
(H) Line $9 \mathrm{a} \times \mathrm{L}$ Line $10 \times 1.0015$ line loss multiplier.
(I) Line $9 \mathrm{~b} \times$ Linc 11 .


Notes:
(A) Description and reason for 'Other' adjustments to net investment for his project, if applicable.
(B) Applicable beginning of period and end of period depreciable base by production plant name(s), unit(s), or plant account(s).
(C) Description of Adjustments to Reserve for Gross Salvage and Other Recoveries and Cost of Removal.
(D) The equily component has been grossed up for taxes. The approved ROE is $10.25 \%$.
(E) Applicable depreciation ratc or rales.
(F) Applicable amortization period.
(G) Description and reason for "Other" adjustments to investment expenses for this project.
(H) Line 9 ax Line $10 \times 1.0015$ line loss multiplier
(I) Line $9 \mathrm{~b} \times$ Linc 11.


Notes:
A) Description and reason for 'Oher' adjustments to net investment for this project, if applicable.
(B) Applicable beginning of period and end of period depreciable base by production plant name(s), unit(s), or plant account(s).
(C) Description of Adjusuments to Reserve for Gross Salvage and Other Recoveries and Cost of Removal.
(D) The equity component has been grossed up for taxcs. The approved ROE is $10.25 \%$.
(E) Applicablc depreciation ratc or rates.
(F) Applicable amortization period.
(G) Description and reason for "Other" adjustments to investment expenses for this project.
(H) Line 9 ax Line $10 \times 1.0015$ line loss multiplier.
(I) Line 9 bx Line 11 .


Notes:
(A) Description and reason for 'Other' adjustments to net investment for this project, if applicable.
(B) Applicable beginning of period and end of period depreciable base by producion plant name(s), unit(s), or plant account(s).
(C) Description of Adjusments to Reserve for Gross Salvage and Other Recoveries and Cost of Removal.
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(E) Applicable depreciation rate or ratc
( H ) Applicable amorlization period.
(G) Description and reason for "Other" adjustments to investnent expenses for this project.
(H) Line 9 ax Line $10 \times 1.0015$ line loss mulhiplier.
(I) Line $9 \mathrm{~b} \times$ Line 11 .


## Nolcs:

(A) Description and reason for 'Other' adjustments to net investment for this project, if applicablc.
(B) Beginning Balances: Crist $\$ 284,622$; Smith $\$ 106,497$. Ending Balances: Crist $\$ 284,622$; Smith $\$ 0$
(C) Description of Adjustments to Reserve for Gross Savage and Ohner Recoveries and Cost of Removal.
(D) The equity component has been grossed up for taxes. The approved ROE is $10.25 \%$.
(E) Applicable depreciation rate or rates.
(F) Applicable amortization period.
(G) Description and reason for "Other" adjustments to investunent expenses for this project.
(H) Linc 9a $\times$ Linc $10 \times 1.0015$ line loss mulliplier.
(I) Line $9 \mathrm{~b} \times$ Linc 11 .


Notes:
(A) Description and reason for 'Oher' adjustments to net investment for this project, if applicable.
(B) Applicable beginning of period and cnd of period depreciablc base by production plant name(s), unil(s), or plant account(s)
(C) Description of Adjustments to Reserve for Gross Salvage and Ohher Recoveries and Cost of Removal.
(D) The equily component has been grossed up for taxes. The approved ROE is $10.25 \%$.
(I) Applicable depreciation rate or ratcs.
(F) Applicable amorization period.
(F) Applicable ammorizalion perion.
(G) Description and reason for "Other" adjustments to investment expenses for this project.
(H) Line 9a $\times$ Line $10 \times 1.0015$ line loss malliplier.
(l) Line $9 \mathrm{~b} \times$ Line 11 .


14 Total Jurisdictional Recoverable Cosis (Lines $12+13$ )

| 158 | 158 | 158 | 158 | 158 | 158 | 157 | 157 | 157 | 156 | 156 | 155 |
| ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: | ---: |
| 1,900 | 1,897 | 1,894 | 1,891 | 1,888 | 1,885 | 1,882 | 1,879 | 1,876 | 1,873 | 1,870 | 1,867 |
|  | 2,058 | 2,055 | 2,052 | 2,049 | 2,046 | 2,043 | 2,039 | 2,036 | 2,033 | 2,029 | 2,026 |

A) Description and reason for 'Other' adjustments to net investment for this project, if applicable.
(B) Applicable beginning of period and end of period depreciable base by production plant name(s), unit(s), or plant account(s).
(C) Description of Adjustments to Reserve for Gross Salvage and Other Recoveries and Cost of Removal.
(D) The equily component has been grossed up for taxes. The approved ROE is $10.25 \%$.
(E) Applicable depreciation rate or ralcs.
(F) Applicablc ammorization period.
(G) Descriplion and reason for "Other" adjustunents to investment expenses for this project.
(H) Line $9 a \times$ Line $10 \times 1.0015$ line loss mulliplicr.
(I) Line $96 \times$ Line 11 .

(B) Applicable beginning of period and end of period depreciable base by production plant name(s), unit(s), or plant account(s)
(C) Description of Adjusiments in Reserve for Gross Salvage and Other Recoverics and Cost of Removal.
(D) The equily component bas been grossed up for taxes. The approved ROE is $10.25 \%$.
(E) Applicable depreciation rate or rates.
(I) Applicable amortization period.
(G) Description and reason for "Ohher" adjustments to invesument expenses for this project.
(H) Line $9 \mathrm{a} \times$ Linc $10 \times 1.0015$ line loss mulliplier.
(1) Line $9 b \times$ Linc 11


Noles:
(A) Description and reason for 'Other' adjustments to net investment for this project, if applicable.
(B) Applicable beginning of period and end of period depreciable base by production plant narne(s), unir(s), or plant account(s)
(C) Ihescription of Adjusments to Reserve for Gross Salvage and Other Recoveries and Cost of Removal.
(D) The equity component has been grossed up for taxes. The approved ROE is $10.25 \%$.
(E) Applicable depreciation rate or rates.
(F) Applicable atnortization period.
(G) Description and reason for "Other" adjustunents to investment expenses for this project.
(H) Line 9a $\times$ Line $10 \times 1.0015$ line loss multiplier.
(l) Linc $9 \mathrm{~b} \times$ Line 11 .



Notes:
(B) Applicable beginning of period and end of period depreciable base by producion plant name(s), unit(s), or plant account(s).
(C) Description of Adjustments to Reserve for Gross Salvage and Other Recoveries and Cost of Removal.
(D) The equity component has been grossed up for taxes. The approved ROE is $10.25 \%$.
(E) Applicable depreciarion ratc or rales.
(F) Portions of PEs $1158.1167 \& 1199$ have a 7-year amorization period The amortizable portion of PE 1287 is fully arnorlized
(G) Description and reason for "Ohher" adjustments to investment expenses for this project.
(H) Line 9ax Line $10 \times 1.0015$ line loss multiplier.
(1) Line $9 \mathrm{~b} \times$ Line 11 .



Nocs.
(A) Dessription and reason for 'Other' adjustments to net investment for this project, if applicable.
(B) Applicable beginning of period and end of period depreciable base by production plant name(s), unit(s), or plant account(s).
(C) Description of Adjustments to Reserve for Gross Salvage and Other Recoveries and Cost of Removal.
(D) The equily component has been grossed up for taxes. The approved ROE is $10.25 \%$.
(E) Applicable depreciation rate or rates.
(F) Applicable annorization period.
(G) Description and reason for "Other" adjustunents to investment expenses for this project.
(H) Line 9 ax Line $10 \times 1.0015$ line loss nmlliplier.
(I) Line $90 \times$ Line 11 .




Notes
A) Description and reason for 'Ohher' adjustments to net investment for this project, if applicable.
(B) Applicable beginning of period and end of period depreciable base by production plant name(s), unit(s), or plant account(s).
(C) Description of Adjustments to Rescrve for Gross Salvage and Other Recoveries and Cost of Removal.
(D) The equity compoocent has been grossed up for taxes. The approved ROE is $10.25 \%$.
(E) Applicable depreciation rate or ratcs.
(F) Applicable amorlization period.
(G) Descriprion and reason for "Other" adjustunents to investment expenses for this project
(H) Line 9a $\times$ Linc $10 \times 1.0015$ line loss multiplier.
(I) Line $9 \mathrm{~b} \times \mathrm{Line} 11$.


Notes:
(A) Description and reason for 'Oher' adjustments to net investment for this project, if applicable.
(B) Applicable beginning of period and end of period depreciable base by production plant narne(s), unit(s), or plant account(s).
(C) Description of Adjustments to Reserve for Gross Salvage and Other Recoveries and Cost of Removal.
(D) The equily component has been grossed up for taxes. The approved ROE is $10.25 \%$.
(İ) Applicable depreciation rate or rates.
(F) Applicable amorizauion period.
(G) Description and rcason for "Other" adjustunents to investment expenses for this project.
(H) Line 9a $\times$ Line $10 \times 1.0015$ line loss multiplier.
(I) Line $9 \mathrm{~b} \times$ Line 11 .

## Gulf Power Company

Enviroumentul Cost Recovery Clanse (ECRC)
Calculation of the Projected Period Amount
January 2016 - December 2016
eturn on Capital Invessments, Depreciation and Taxe
P.E.s 1034. 1035, 1036, 1037, 1067, 1075, 1095, 1168, 1187, 1188, 1222, 1233, 1259, 1279, 1288, 1362, 1468, 1469, 1505, 1508, 1512, 1513, 1517, 1551, 1552, 1646, 1647, 1684, 1809, 1810, 1824, 1826, 1909, 1911, 1913, 1950

| Ling | DescrintionBegimning of <br> Period Amoun | Projected January | Projected Febivary | Projected March | Projected Ancil | Projected May | Projected June | Projected July | Projected人ugust | Projected Scotember | Projected Oclober | Projected Noyember | Projected <br> December | 12-Month Period Amount |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| 1 | Investments |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | a Expenditures/Additions | 3,707,838 | 1,644,655 | 1.566,036 | 1,509,761 | 1,503,091 | 1,527,099 | 430,937 | 87,207 | 1,092,814 | 1,076,031 | 1,116,693 | 1,076,043 |  |
|  | b Clearings to Plant | 3,126,175 | 1,062,993 | 1,066,980 | 1,010,705 | 1,004,035 | 988.668 | 3,793,098 | 45,541 | 45,503 | 28,720 | 28,720 | 4,063,250 |  |
|  | c Retirements | 0 | 0 | 0 | 12,701,643 | 0 | 0 | 0 | 0 | 0 |  | 2,068,161 | 996,591 |  |
|  | d Cost of Removal | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 368,150 | 0 |  |
|  | c Salvage | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 80,000 |  |
| 2 | Plant-ill-ServicefDepreciation I3ase (B) $\quad$, 163,876,874 | 1,167,003,049 | 1,168,066,042 | 1,169.133.022 | 1,157,442,083 | 1,158,446,118 | 1,159,434,786 | 1,163.227,884 | 1,163,273,425 | 1,163,318,928 | 1,163,347,648 | 1,161,308,207 | 1,164,374,866 |  |
| 3 | Less: Accumulated Depreciation (C) (178,371,900) | $(181,877.822)$ | (185,391,037) | (188,906,732) | (179,723,273) | $(183,208,886)$ | (186,696,841) | ( $190,187,103$ ) | (193,688,402) | $(197,189,808)$ | (200,691,321) | (201,756,589) | (204,335,611) |  |
| 4 | CWIP - Non Intercst Bearing $\quad$ 2,474,894 | 3,056,557 | 3,638.219 | 4,137,275 | 4,636,331 | 5,135.387 | 5,673,818 | 2,311,657 | 2,353,323 | 3,400,634 | 4.447,945 | 5,535,918 | 2,548,711 |  |
| 5 |  | 988,181.784 | 986,313.223 | 984,363.564 | 982,355,141 | 980,372,619 | 978,411,763 | 975,352,438 | 971,938,345 | 969,529,754 | 967,104,272 | 965,087,536 | 962,587,966 |  |
| 6 | Average Net Investment | 988,080,825 | 987,247,503 | 985,338,394 | 983,359,353 | 981,363,880 | 979,392,191 | 976,882,101 | 973,645,392 | 970,734,049 | 968,317,013 | 966,095,904 | 963,837,751 |  |
| 7 | Retum on Average Net Investment |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | a Equily Component (Line $6 \times$ Equity Component $\times$ 1/12) (D) | 5,366,267 | 5,361,741 | 5,351,373 | 5,340,625 | 5,329,787 | 5,319,079 | 5,305,447 | 5,287,868 | 5,272,057 | 5,258,930 | 5,246,867 | 5,234,603 | 63,674,643 |
|  | b Debi Component (Live $6 \times$ Debr Componcmi $\times$ 1/12) | 1,371,456 | 1,370,300 | 1,367,650 | 1,364,903 | 1,362,133 | 1,359,396 | 1,355,912 | 1,351,420 | 1,347,379 | 1,344,024 | 1,340,941 | 1,337,807 | 16,273,321 |
| 8 | Investment Expenses |  |  |  |  |  |  |  |  |  |  |  |  |  |
|  | a Depreciation (E) | 3,167,588 | 3,174,881 | 3,177,361 | 3,179,850 | 3,147,279 | 3,149,621 | 3,151,928 | 3,162,966 | 3,163,072 | 3,163,178 | 3,163,245 | 3,157,279 | 37,958,248 |
|  | b Amorization ( F ) | 23,437 | 23,437 | 23,437 | 23,437 | 23,437 | 23,437 | 23,437 | 23,437 | 23.437 | 23,437 | 23,437 | 23,437 | 281,244 |
|  | c Dismanclement | 314,897 | 314,897 | 314,897 | 314,897 | 314,897 | 314,897 | 314,897 | 314,897 | 314.897 | 314,897 | 314,897 | 314,897 | 3,778,764 |
|  | d Property Taxes | 351,836 | 351,836 | 351,836 | 351,836 | 351,836 | 351,836 | 351,836 | 351,836 | 351,836 | 351,836 | 351,836 | 351,836 | 4,222,033 |
|  | e Oriber (G) | 0 | 0 | 0 | 0 | , | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| 9 | Total System Reco verable Expenses (Lites 7+8) | 10,595,481 | 10,597,092 | 10,586.554 | 10,575,548 | 10,529,369 | 10.518.267 | 10.503,457 | 10,492,424 | 10,472,678 | 10.456.302 | 10,441,223 | 10,419,859 | 126,188,252 |
|  | a Recoveruble Costs Allocuted to Energy | 815,037 | 815,161 | 814,350 | 813,504 | 809,951 | 809,097 | 807,958 | 807,110 | 805.591 | 804,331 | 803,171 | 801,528 | 9,706,789 |
|  | b Recoverable Costs Allocated to Demand | 9,780,444 | 9,781,931 | 9,772,203 | 9,762,0144 | 9,719,418 | 9,709,169 | 9,695,499 | 9,685,314 | 9,667,087 | 9,651,971 | 9,638,052 | 9,618,331 | 116,481,463 |
| 10 | Energy Jurisdictional Factor | 0.9682439 | 0.9694592 | 0.9702248 | 0.9711428 | 0.9716749 | 0.9723972 | 0.9724397 | 0.9719927 | 0.9722491 | 0.9712453 | 0.9696982 | 0.9681922 |  |
| 11 | Demand Jurisdictiowail Factor | 0.9707146 | 0.9707146 | 0.9707146 | 0.9707146 | 0.9707146 | 0.9707146 | 0.9707146 | 0.9707146 | 0.9707146 | 0.9707146 | 0.9707146 | 0.9707146 |  |
| 12 | Recail Energy-Related Recoverable Costs (H) | 790.338 | 791,451 | 791,288 | 791,213 | 788,190 | 787,944 | 786,869 | 785,681 | 784,410 | 782,374 | 780,002 | 777.197 | 9,436,958 |
| 13 | Retaid Demand-Related Recoverable Cosis (1) | 9,494,020 | 9,495,463 | 9,486,020 | 9.476,159 | 9,434,781 | 9.424,832 | 9,411,562 | 9.401,676 | 9,383,982 | 9,369,309 | 9,355,798 | 9,336,655 | 113,070,257 |
| 14 | Total Jurisdiclional Recoverable Cosis (Lines $12+13$ ) | 10,284,358 | 10,286,914 | 10,277,308 | 10,267.372 | 10,222,971 | 10.212.776 | 10,198.431 | 10,187.357 | 10,168,392 | 10,151,684 | 10,135,800 | 10,113,852 | 122,507.215 |

Notes:
(A) Description and reason for 'Other' adjustments to nel Investment for this project, if applicable
(B) Beginning Balances: Crist $\$ 783,351,695$; Smith $\$ 12,931,385$; Danicl $\$ 367,593,793$. Ending Balancos: Crist $\$ 788,097,895$; Smith $\$ 229,742 ;$ Daniel $\$ 376,047,229$
(C) Description of Adjustments to Reserve for Gross Salvage and Other Recoverics and Cost of Removal
(D) The equity component has been grossed up for taxes. The approved ROE is $10.25 \%$.
(E) Applicable depreciation ralc or rates.
(F) Portions of PE 1222. 1233, 1279 亿uxd 1909 lave a 7 fear anorization peciod. PE 1168 las a 7 year amortization period.
(G) Description and reason for "Other" adjustments to irvestment expenses for this project.
(H) Linct $9 a x$ Line $10 \times 1.0015$ linc
(H) Line $9 \mathrm{a} \times$ Line $10 \times 1.0015$ linc koss multiplier
(I) Line $96 \times$ Live 11 .



(A) The equity component has been grossed up for laxcs. The approved ROE is $10.25 \%$.
(B) Line $9 \mathrm{a} \times$ Line $10 \times 1.0015$ line loss multiplier.
(C) Line $96 \times$ Line 11 .
(D) Line 6 is repored on Schedule 3P.
(E) Line 8 is reported on Schedule 2P.

(A) The equily component Las been grossed up for taxcs. The approved ROE is $10.25 \%$.
(B) Line $9 \mathrm{a} \times \mathrm{L}$ Line $10 \times 1.0015$ linc loss mulliplier.
(C) Live $96 \times$ Line 11 .
(D) Linc 6 is reported on Scledute 3P
(E) Line 8 is reported on Schedule 2P


Notes:
(A) The equity component bas been grossed up for taxes. The approved ROE is $10.25 \%$.
A) The equity component bas ban gossed 1
(B) Line $9 \mathrm{ab} \times$ Line 10
(D) Line 6 is reported on Scbedule 3P
(E) Line 8 is reported on Schedulc 2 P.

(A) The equity component bas been grossed up for taxes. The approved ROE is $10.25 \%$.
(B) Line $9 \mathrm{a} \times$ Line $10 \times 1.0015$ hine loss multiplier.
(C) Line $9 \mathrm{~b} \times$ Linc 11
(D) Line 6 is reported on Schedule $3 P$
(E) Linc 8 is reported on Schodule 2P

Schedule 5P
Page 1 of 55

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016

## Description and Progress Report of Environmental Compliance Activities and Projects

Title: Air Quality Assurance Testing PEs 1006 and 1244

FPSC Approval: Order No. PSC-94-0044-FOF-EI

## Description:

This line item includes the audit test trailer and associated support equipment used to conduct Relative Accuracy Test Audits (RATAs) on the Continuous Emission Monitoring Systems (CEMS) as required by the 1990 Clean Air Act Amendments (CAAA).

## Accomplishments:

The RATA test trailer CEM system was replaced during the 2002-2003 recovery period. The CEMS trailer was also replaced in 2010. These replacements provide Gulf with the accuracy and reliability needed to accurately measure $\mathrm{SO}_{2}, \mathrm{NOx}$, and $\mathrm{CO}_{2}$ and to further maintain compliance with CAAA requirements.

Project-to-Date: \$0
Progress Summary: Retired.
Projections: N/A

# Gulf Power Company 

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016
Description and Progress Report of Environmental Compliance Activities and Projects

Title: Crist 5, 6 \& 7 Precipitator Projects<br>PEs 1038, 1119, 1216, 1243, and 1249

## FPSC Approval: Order No. PSC-94-0044-FOF-EI <br> Order No. PSC-09-0759-FOF-EI

## Description:

The Plant Crist precipitator projects are necessary to improve particulate removal capabilities as a result of burning low sulfur coal. The larger more efficient precipitators with increased collection areas improve particulate collection efficiency.

## Accomplishments:

The precipitators have successfully reduced particulate emissions. The upgraded Crist Unit 7 precipitator was placed in service during 2004 as part of the FDEP agreement. The Plant Crist Unit 6 precipitator upgrade was placed in service in April 2012. The digital control system for the Unit 6 precipitator will be upgraded during 2015.

Project-to-Date: Plant-in-service of $\$ 33,678,001$ projected at December 2016.
Progress Summary: In Service
Projections: N/A

Schedule 5P
Page 3 of 55

# Gulf Power Company <br> Environmental Cost Recovery Clause (ECRC) <br> January 2016-December 2016 

Description and Progress Report of Environmental Compliance Activities and Projects

## Title: Crist 7 Flue Gas Conditioning PE 1228

## FPSC Approval: Order No. PSC-94-0044-FOF-EI

## Description:

This project included the injection of sulfur trioxide into the flue gas to enhance particulate removal and improve the collection characteristics of fly ash. Retirement of the Plant Crist Unit 7 flue gas conditioning system was completed during July 2005.

## Accomplishments:

The system enhanced particulate removal in the precipitator.
Project-to-Date: \$0
Progress Summary: Retired
Projections: N/A

# Gulf Power Company 

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016

## Description and Progress Report of Environmental Compliance Activities and Projects

## Title: Low NO ${ }_{x}$ Burners, Crist 6 \& 7

PEs 1234, 1236, 1242, and 1284

## FPSC Approval: Order No. PSC-94-0044-FOF-EI

## Description:

Low $\mathrm{NO}_{x}$ burners are unique burners installed to decrease the $\mathrm{NO}_{x}$ emissions that are formed during the combustion process. This equipment was installed to meet the requirements of the 1990 Clean Air Act Amendments.

## Accomplishments:

The Low $\mathrm{NO}_{\mathrm{x}}$ burner systems have proven effective in reducing $\mathrm{NO}_{\mathrm{x}}$ emissions. The low $\mathrm{NO}_{\mathrm{x}}$ burners on Crist Unit 7 were replaced during the 2003-2004 time frame and the Crist Unit 6 burners were replaced during December 2005. The digital control systems for the Unit 6 and Unit 7 Low NOx burners will be upgraded during 2015.

Project-to-Date: Plant-in-service of $\$ 12,010,894$ projected at December 2016.
Progress Summary: In-Service
Projections: N/A

# Gulf Power Company <br> Environmental Cost Recovery Clause (ECRC) <br> January 2016-December 2016 <br> <br> Description and Progress Report of <br> <br> Description and Progress Report of Environmental Compliance Activities and Projects 

 Environmental Compliance Activities and Projects}

Title: CEMs - Plant Crist, Scholz, Smith, and Daniel<br>PEs 1001, 1060, 1154, 1164, 1213, 1217, 1240, 1245, 1247, 1256, 1283, 1286,<br>1289, 1290, 1311, 1316, 1323, 1324, 1325, 1357, 1358, 1364, 1440, 1441, 1442,<br>1444, 1445, 1454, 1459, 1460, 1558, 1570, 1592, 1658, 1829, and 1830

## FPSC Approval: Order No. PSC-94-0044-FOF-EI

## Description:

The Continuous Emission Monitoring (CEM) line item includes dilution extraction emission monitors that measure the concentrations of sulfur dioxide $\left(\mathrm{SO}_{2}\right)$, carbon dioxide $\left(\mathrm{CO}_{2}\right)$ and nitrogen oxides $\left(\mathrm{NO}_{\mathrm{x}}\right)$ in the flue gas. Opacity and flow monitors were also installed under this line item. All CEMs monitors were installed pursuant to the 1990 Clean Air Act Amendments (CAAA).

## Accomplishments:

The systems at both Gulf and Mississippi Power continue to successfully exceed routine quality assurance/quality control (QA/QC) audits as required by the 1990 CAAA.

Project-to-Date: Plant-in-service of $\$ 7,673,179$ projected at December 2016.

## Progress Summary:

The Plant Scholz Units $1 \& 2$ CEMS analyzer replacements and the Smith Unit 1 gas analyzers and opacity monitor replacements were completed in 2001 and 2002. The Plant Crist Unit 6 \& 7 and the Plant Scholz Units $1 \& 2$ flow monitors were replaced during 2005. The Plant Daniel Units $1 \& 2$ gas analyzers were also replaced during 2005 and the flow monitors were replaced during 2007. During 2008, the opacity, flow, and gas monitors at Plant Smith and opacity and gas monitors at Plant Scholz were replaced. During the 2009 recovery period, the CEMS project included replacement of opacity monitors at Plant Crist on Units 4 through 7 and the installation of CEMs equipment for the new Plant Crist scrubber stack to monitor $\mathrm{SO}_{2}, \mathrm{NOx}, \mathrm{CO}_{2}$ and flow. Plant Crist completed the installation of two CEMS bypass monitoring systems for Units 4 through 7 in the 2011-2012 timeframe. During 2016, Plant Crist will upgrade and relocate the CEMS bypass monitoring system from the stack to the individual unit duct to comply with the MATS rule and upgrade Plant Crist's Unit 7 flue gas monitors. The Smith CEMS systems are projected to be retired in April 2016 after the coal units cease operations in March 2016. The Scholz CEMS systems were retired in 2015 after the coal units ceased operation.

Projections: Expenditures reflected in the 2016 projection filing for this line item total \$3,081,553

# Gulf Power Company <br> Environmental Cost Recovery Clause (ECRC) <br> January 2016-December 2016 <br> Description and Progress Report of Environmental Compliance Activities and Projects 

## Title: Substation Contamination Remediation

PEs 1007, 2859, 3400, 3412, 3463, and 3477

FPSC Approval: Order No. PSC-95-1051-FOF-EI

## Description:

Three groundwater treatment systems were purchased for the treatment of contaminated groundwater at substation sites. Capital components of substation soil remediation projects are also included in the line.

## Accomplishments:

Systems have proven effective in groundwater remediation. During 2014 additional groundwater recovery well pumps and controls were added to the existing Ft. Walton substation treatment system.

Project-to-Date: Plant-in-service of \$2,483,333 projected at December 2016.
Progress Summary: N/A
Projections: N/A

Schedule 5P
Page 7 of 55

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016
Description and Progress Report of Environmental Compliance Activities and Projects

Title: Raw Water Flowmeters - Plants Crist and Smith PEs 1155 and 1606

## FPSC Approval: Order No. PSC-96-1171-FOF-EI

## Description:

The Raw Water Flow Meters capital project was necessary for Gulf to comply with the Plant Crist and Plant Smith Consumptive Use and Individual Water Use permits issued by the Northwest Florida Water Management District (NWFWMD). These permits require the installation and monitoring of in-line totaling water flow meters on all existing and future water supply wells. Gulf incurred costs related to the installation and operation of new in-line totaling water flow meters at Plant Crist and Plant Smith for implementation of this new activity.

## Accomplishments:

The raw water flow meters have been installed at Plant Crist and Plant Smith.
Project-to-Date: Plant-in-service of $\$ 242,973$ projected at December 2016.
Progress Summary: In-Service
Projections: N/A

# Gulf Power Company 

Environmental Cost Recovery Clause (ECRC) January 2016-December 2016

Description and Progress Report of Environmental Compliance Activities and Projects

Title: Crist Cooling Tower Cell

PE 1232

## FPSC Approval: Order No. PSC-94-0044-FOF-EI

## Description:

The Crist Cooling Tower is a pollution control device which allows condenser cooling water to be continually reinjected into the condenser. The cooling tower reduces water discharge temperatures to meet the National Pollution Discharge Elimination System (NPDES) industrial wastewater permit requirements.

## Accomplishments:

Plant Crist has maintained compliance with the temperature discharge limits as required by the facility's NPDES Permit. The original cooling tower cell was retired during July 2007 when the new Crist Unit 7 cooling tower was placed-in-service.

Project-to-Date: \$0
Progress Summary: Retired
Projections: N/A

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## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016
Description and Progress Report of
Environmental Compliance Activities and Projects

## Title: Crist Dechlorination System <br> PE 1180 and PE 1248

## FPSC Approval: Order No. PSC-94-1207-FOF-EI

## Description:

State and Federal Pollution Discharge Elimination System permits require significant reductions in chlorine concentrations prior to discharge from the plant. The Crist dechlorination system uses sodium bisulfite to chemically eliminate the residual chlorine present in the plant industrial wastewater prior to discharge.

## Accomplishments:

During 2011-2012 Plant Crist replaced the existing sodium bisulfate storage tank and installed a new dechlorination system for the Unit 6 and Unit 7 cooling tower blowdowns and the ECUA return water pit. These systems are necessary in order to dechlorinate the industrial wastewater prior to discharge. The system has been effective in maintaining chlorine discharge limits.

Project-to-Date: Plant-in-service of $\$ 380,697$ projected at December 2016.
Progress Summary: In service
Projections: N/A

# Gulf Power Company 

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016
Description and Progress Report of Environmental Compliance Activities and Projects

Title: Crist Diesel Fuel Oil Remediation PE 1270

## FPSC Approval: Order No. PSC-94-1207-FOF-EI

## Description:

The Plant Crist diesel fuel oil remediation project included installing monitoring wells in the vicinity of the Crist diesel tank systems to determine if groundwater contamination was present. The project also included the installation of an impervious cap to reduce migration of contaminants to groundwater.

Accomplishments: Monitoring wells and an impervious cap were installed.
Project-to-Date: Plant-in-service of \$68,923 projected at December 2016.
Progress Summary: In-Service
Projections: N/A

# Gulf Power Company <br> Environmental Cost Recovery Clause (ECRC) <br> January 2016-December 2016 <br> Description and Progress Report of Environmental Compliance Activities and Projects 

## Title: Crist Bulk Tanker Unloading Secondary Containment PE 1271

FPSC Approval: Order No. PSC-94-1207-FOF-EI

## Description:

The Crist Bulk Tanker Unloading Secondary Containment project was necessary to minimize the potential risk of an uncontrolled discharge of pollutants into the waters of the United States. Secondary containment must be installed for tank unloading racks pursuant to the Federal Spill Prevention Control and Countermeasures (SPCC) regulation (40 CFR Part 112).

## Accomplishments:

The Plant Crist unloading area secondary containment area complies with current SPCC regulatory requirements.

Project-to-Date: Plant-in-service of \$101,495 projected at December 2016.
Progress Summary: In-Service
Projections: N/A

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## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016

## Description and Progress Report of Environmental Compliance Activities and Projects

## Title: Crist IWW Sampling System <br> PE 1275

## FPSC Approval: Order No. PSC-94-1207-FOF-EI

## Description:

The 1993 revision to Plant Crist's National Pollutant Discharge Elimination System (NPDES) industrial wastewater permit moved the compliance point from the end of the discharge canal to a point upstream of Thompson's Bayou. To allow for this sample point modification, an access dock was constructed in the discharge canal. The Crist Industrial Wastewater (IWW) project also included a small building for monitoring and sampling equipment.

## Accomplishments:

The dock is complete and samples are being collected at the required compliance point.
Project-to-Date: Plant-in-service of $\$ 59,543$ projected at December 2016.
Progress Summary: In-Service
Projections: N/A

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# Gulf Power Company <br> Environmental Cost Recovery Clause (ECRC) <br> January 2016-December 2016 <br> Description and Progress Report of Environmental Compliance Activities and Projects 

Title: Sodium Injection System<br>PEs 1214 and 1413

## FPSC Approval: Order No. PSC-99-1954-FOF-EI

## Description:

The Sodium Injection System line item includes silo storage systems and associated components that inject sodium carbonate directly onto the coal feeder belt to enhance precipitator performance when burning low sulfur coal. Sodium injection is used at Plant Smith on Units 1 and 2 and at Plant Crist on Units 4 and 5. The injection of sodium carbonate as an additive to low sulfur coal reduces opacity levels to maintain compliance with the Clean Air Act provisions.

## Accomplishments:

The silo storage and injection system components at Plants Smith and Crist have been installed. These systems are fully operational. The Smith systems are projected to be retired in April 2016 after the coal units cease operations in March 2016.

Project-to-Date: Plant-in-service of \$284,622 projected at December 2016.
Progress Summary: In Service
Projections: N/A

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016
Description and Progress Report of Environmental Compliance Activities and Projects

## Title: Smith Stormwater Collection System

PE 1446

FPSC Approval: Order No. PSC-94-1207-FOF-EI

## Description:

The National Pollutant Discharge Elimination System (NPDES) stormwater program requires industrial facilities to install stormwater management systems in order to prevent the unpermitted discharge of contaminated stormwater to the surface waters of the United States.

## Accomplishments:

The Plant Smith stormwater sump system has been effective in managing onsite stormwater.

Project-to-Date: Plant-in-service of \$2,782,600 projected at December 2016.
Progress Summary: In-Service
Projections: N/A

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# Gulf Power Company <br> Environmental Cost Recovery Clause (ECRC) <br> January 2016-December 2016 <br> Description and Progress Report of Environmental Compliance Activities and Projects 

## Title: Smith Waste Water Treatment Facility <br> PEs 1466 and 1643

FPSC Approval: Order No. PSC-94-0044-FOF-EI

## Description:

During the 1990's a wastewater treatment facility was installed at Plant Smith to replace the septic tank system that was installed in the early 1960's. In April 2004 a new wastewater treatment facility with additional capacity was installed to replace the facility installed in the 1990's. The new treatment plant includes aeration and chlorination of the wastewater prior to discharge in the Plant Smith ash pond.

Accomplishments: Plant Smith has maintained compliance with the NPDES industrial wastewater permit.

Project-to-Date: Plant-in-service of $\$ 178,962$ projected at December 2016.
Progress Summary: In-Service
Projections: N/A

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## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016

## Description and Progress Report of Environmental Compliance Activities and Projects

Title: Daniel Ash Management Project<br>PEs 1501, 1535, 1555, and 1819

## FPSC Approval: Order No. PSC-94-0044-FOF-EI

Description:
The original Daniel Ash Management project included the installation of a dry ash transport system, lining the bottom of the ash pond, closure and capping of the existing fly ash pond, and expansion of the landfill area. During 2006 Plant Daniel completed construction of a new on-site ash storage facility in preparation for the completion and closure of the existing landfill area.

Accomplishments: Construction of the new on-site ash storage facility was completed in 2006. Portions of the original Daniel ash storage facility were closed in place during 2010.

Project-to-Date: Plant-in-service of \$14,950,124 projected at December 2016.
Progress Summary: In-Service
Projections: N/A

# Gulf Power Company <br> Environmental Cost Recovery Clause (ECRC) <br> January 2016-December 2016 <br> Description and Progress Report of Environmental Compliance Activities and Projects 

Title: Smith Water Conservation

PEs 1601, 1620, \& 1638

## FPSC Approval: Order No. PSC-01-1788-FOF-EI and Order No. PSC-09-0759-FOF-EI

## Description:

Specific Condition nine of Plant Smith's consumptive use permit, issued by the Northwest Florida Water Management District (NWFWMD), requires the plant to implement measures to increase water conservation and efficiency at the facility. Phase I of the Smith Water Conservation project consisted of adding pumps, piping, valves, and controls to reclaim water from the ash pond. Phase II, the Smith Closed Loop Cooling System for the laboratory sampling system, was installed during 2005 to further reduce groundwater usage. Phase III includes investigating and installing a deep injection will system to allow Plant Smith to utilize reclaimed water.

As discussed in previous filings, Gulf has determined that it is feasible to inject reclaimed water into the Plant Smith deep injection well system. Gulf has installed three deep injection wells and will begin the process of installing piping and initial equipment for the pump station during the latter portion of 2015 and the first part of 2016. During 2016, Gulf will obtain additional operational data required to design the final pump station and wastewater treatment equipment as well as any additional piping.

Accomplishments: Plant Smith estimated that the closed loop cooling project reduced water consumption by approximately 125,000 gallons per day.

Project-to-Date: Plant-in-service of $\$ 17,038,307$ projected at December 2016.
Progress Summary: See Accomplishments
Projections: The projected 2016 expenditures for this line item total $\$ 340,807$.

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## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016
Description and Progress Report of Environmental Compliance Activities and Projects

## Title: Underground Fuel Tank Replacement PE 4397

FPSC Approval: Order No. PSC-94-0044-FOF-EI

## Description:

The Underground Fuel Tank Replacement Program provided for the replacement of Gulf's underground storage tanks with new above ground tanks (ASTs). The installation of ASTs significantly reduced the risk of potential petroleum product discharges, groundwater contamination, and subsequent remediation activities.

## Accomplishments:

All underground storage tanks have been replaced with above ground tank systems.
Project-to-Date: \$0
Progress Summary: See Accomplishments
Projections: N/A

# Gulf Power Company 

Environmental Cost Recovey Clause (ECRC)
January 2016-December 2016

## Description and Progress Report of Environmental Compliance Activities and Projects

Title: Crist FDEP Agreement for Ozone Attainment
PEs 1031, 1158, 1167, 1199, 1250, 1258, 1287, and 1958
FPSC Approval: Order No. PSC-02-1396-FOF-EI

## Description:

The Florida Department of Environmental Protection (FDEP) and Gulf Power entered into an agreement on August 28, 2002 to support Escambia/Santa Rosa County area's effort to maintain compliance with the 8 -hour ozone ambient air quality standards. This agreement included a requirement for Gulf to install Selective Catalytic Reduction (SCR) controls on Plant Crist Unit 7, relocate the Crist Unit 7 precipitator, and install a $\mathrm{NO}_{\mathrm{x}}$ reduction technology on Plant Crist Unit 6, and Units 4 and 5 if necessary, to meet the $\mathrm{NO}_{\mathrm{x}}$ standard specified in the Agreement.

Accomplishments: The new Crist Unit 7 precipitator and SCR were placed in service during 2004 and 2005, respectively. The Crist Unit 6 Selective Non-Catalytic Reduction (SNCR)/low NOx burners with Over-Fired Air (OFA) technologies were then placed in service during November 2005. The Crist Unit 4 and Unit 5 SNCRs were subsequently placed in service during April 2006. The Crist Unit 6 SNCR was retired during the Spring of 2012 when the Crist Unit 6 SCR was placed in-service. Gulf replaced one layer of the Plant Crist Unit 7 SCR catalyst during the Fall of 2014. Gulf replaced the Plant Crist Unit 7 SCR ammonia unloading piping during 2015 and upgraded the digital control system for the Unit 7 SCR. Gulf plans to add or replace a layer of the Plant Crist unit 7 SCR catalyst and install the Plant Crist unit 6 flame scanner during 2016.

Project-to-Date: Plant-in-service of $\$ 120,839,331$ projected at December 2016.
Progress Summary: In-Service.

Projections: The projected 2016 expenditures for this line item total $\$ 1,183,284$.

# Gulf Power Company <br> Environmental Cost Recovery Clause (ECRC) <br> January 2016-December 2016 

# Description and Progress Report of Environmental Compliance Activities and Projects 

## Title: SPCC Compliance <br> PEs 1272, 1404, and 1628

FPSC Approval: Order No. PSC-03-1348-FOF-EI

## Description:

The SPCC Compliance projects were required as the result of a more stringent July 2002 revision to Title 40 Code of Federal Regulation Part 112, which is commonly referred to as the Spill Prevention Control and Countermeasures (SPCC) regulation. The 2002 regulatory revision specifically included oil-containing electrical equipment within the scope of the regulation. Therefore, oil-filled electrical equipment that has the potential to discharge to navigable waters must be provided with appropriate containment and/or diversionary structures to prevent such a discharge. The 2002 revisions also resulted in oil storage containers having a capacity greater than or equal to 55 gallons being classified as bulk storage containers that are subject to the secondary containment requirements in 40 CFR Part 112.8(c).

Accomplishments: The 2006 SPCC project at Plant Crist routed stormwater from the switchyard drains to the new oil skimming sump where any potential spill could be captured, preventing the oil from reaching surface water. During 2009, Plant Smith installed secondary containment for a padmount transformer located along the ash pond discharge canal. During 2012, Plant Smith installed a secondary containment system for the diesel emergency sump pump system.

Project-to-Date: Plant-in-service of \$934,730 projected at December 2016.
Progress Summary: In-service

Projections: N/A

# Gulf Power Company 

# Description and Progress Report of Environmental Compliance Activities and Projects 

## Title: Crist Common FTIR Monitor

PE 1297

FPSC Approval: Order No. PSC-03-1348-FOF-EI

## Description:

The purchase of a Fourier Transform Infrared (FTIR) spectrometer, a device used to measure and analyze various low concentration stack gas emissions, was required at Plant Crist under Title V regulations.

Accomplishments: Purchasing the FTIR instrument has enabled Gulf Power to measure ammonia slip emissions as required by the Plant Crist air permit.

Project-to-Date: Plant-in-service of $\$ 62,870$ projected at December 2016
Progress Summary: In-Service

Projections: N/A

# Gulf Power Company 

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016

## Description and Progress Report of Environmental Compliance Activities and Projects

# Precipitator Upgrades for Compliance Assurance Monitoring Compliance PEs 1175, 1191, 1305, 1330, 1461, and 1462 

FPSC Approval: Order No. PSC-04-1187-FOF-EI

Description: Compliance Assurance Monitoring (CAM) Precipitator Upgrades were required to comply with new CAM regulations. CAM requirements are regulated under Title V of the 1990 Clean Air Act Amendments (CAAA) which requires a method of continuously monitoring particulate emissions. Opacity can be used as a surrogate parameter if the precipitator demonstrates a correlation between opacity and particulate matter. Gulf demonstrated this correlation by stack testing in 2003 and 2004, and the results were included as part of the CAM plans in Gulf's Title V Air Permits effective January 2005. Several precipitator upgrades have been necessary to meet the more stringent surrogate opacity standards under CAM.

Accomplishments: The Plant Smith Unit 2 and Unit 1 precipitator upgrades were placed in service during April 2005 and May 2007, respectively. The Plant Scholz Unit 2 precipitator upgrade was completed during December of 2007. The Plant Crist Units 4 and 5 precipitator upgrades were placed in-service during March of 2008. The Scholz precipitators were retired in 2015. The Plant Smith precipitators are projected to be retired in April 2016 after Plant Smith Units 1 \& 2 cease operations in March 2016.

Project-to-Date: Plant-in-service of \$13,997,696 projected at December 2016.
Progress Summary: See Accomplishments

Projections: N/A

# Gulf Power Company <br> Environmental Cost Recovery Clause (ECRC) <br> January 2016-December 2016 <br> Description and Progress Report of Environmental Compliance Activities and Projects 

## Title: Plant Groundwater Investigation <br> PEs 1218 and 1361

FPSC Approval: Order No. PSC-05-1251-FOF-EI

Description: The Florida Department of Environmental Protection (FDEP) lowered the arsenic groundwater standard from $0.05 \mathrm{mg} / \mathrm{L}$ to $0.01 \mathrm{mg} / \mathrm{L}$ effective January $1,2005$. Historical groundwater monitoring data from Plants Crist and Scholz indicated that these facilities may be unable to comply with the lower standard.

Accomplishments: The Plant Crist and Plant Scholz projects have been canceled because Gulf has been released from any remedial actions at these sites.

Project-to-Date: \$0
Progress Summary: See Accomplishments

Projections: N/A

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016

## Description and Progress Report of Environmental Compliance Activities and Projects

Title: Crist Water Conservation Project<br>PEs 1178, 1227 and 1298

## FPSC Approval: Order No. PSC-05-1251-FOF-EI

## Description:

This project is part of the Plant Crist water conservation and consumptive use efficiency program to reduce the demand for groundwater and surface water withdrawals. Specific Condition six of the Northwest Florida Water Management District Individual Water Use Permit Number 19850074 issued January 27, 2005 requires Plant Crist to implement measures to increase water conservation and efficiency at the facility. The first Plant Crist Water Conservation project was placed in service during 2006. This project included installing automatic level controls on the fire water tanks to reduce groundwater usage. The second phase of the project involves utilizing reclaimed water from ECUA's wastewater treatment plant to reduce the demand for groundwater and surface water withdrawals at Plant Crist. The Northwest Florida Water Management District has agreed that this is a valid project to pursue for continued implementation of the water conservation effort.

Accomplishments: Level controls were installed on the fire tank system during 2006. Portions of the Plant Crist reclaimed water project were placed in-service in 2009 and 2010. Gulf began receiving reclaimed water from ECUA in November 2010. During the 2011-2012 timeframe, Gulf installed defoaming and acid injection systems for the Units 6-7 cooling towers to treat scaling and foam associated with reclaimed water usage.

Project-to-Date: Plant-in-service of $\$ 20,023,891$ projected at December 2016.
Progress Summary: See Accomplishments

Projections: N/A

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016

## Description and Progress Report of Environmental Compliance Activities and Projects

## Title: Plant NPDES Permit Compliance Projects <br> PE 1204 and 1299

FPSC Approval: Order No. PSC-05-1251-FOF-EI

Description: The water quality based copper effluent limitations included in Chapter 62 Part 302, Florida Administrative Code (F.A.C.) were amended in April 2002 with an effective date of May 2002. The more stringent hardness based standard is included by reference in the Plant Crist National Pollution Discharge Elimination System (NPDES) industrial wastewater permit.

Accomplishments: Plant Crist installed stainless steel condenser tubes on Unit 6 during June 2006 in an effort to meet the revised water quality standards during times of lower hardness in the river water. During 2008, Plant Crist completed the second phase of the project which involved installing a chemical treatment system in the ash pond. During 2010, Gulf completed the third phase of the project that included installing an aeration system in the ash pond. During 2011-2012, Plant Crist completed installation of a new caustic tank and a sulfuric acid tank as part of the ash pond chemical treatment system.

Project-to-Date: Plant-in-service of $\$ 6,153,140$ projected at December 2016.
Progress Summary: See Accomplishments

Projections: N/A

# Gulf Power Company 

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016
Description and Progress Report of Environmental Compliance Activities and Projects

Title: Air Quality Compliance Program<br>PEs 1034, 1035, 1036, 1037, 1067, 1075, 1095, 1168, 1187, 1188, 1222, 1233, 1259, 1279, 1362, 1468, 1469, 1505, 1508, 1512, 1513, 1517, 1551, 1552, 1646, 1647, 1684, 1809, 1810, 1824, 1826, 1909, 1911, 1913, and 1950

FPSC Approval: Order No. PSC-06-0972-FOF-EI

Description: This line item includes the prudently incurred costs for compliance with Gulf's Air Quality Compliance Program.

Accomplishments: The Plant Smith Unit 1 and Unit 2 SNCRs were placed in service during May 2009 and December 2008, respectively. The Crist Units $4-7$ scrubber project was placed in-service in December of 2009 and the Crist Unit 6 hydrated lime injection system was placed in-service in 2011. The Plant Crist Unit 6 SCR was placed-in-service in April of 2012. Gulf added an additional catalyst layer to the Plant Crist Unit 6 SCR in 2015. The digital control systems for the Unit 6 SCR and the scrubber were upgraded in 2015.

Project-to-Date: Plant-in-service of $\$ 1,164,403,582$ projected at December 2016.
Progress Summary: Gulf Power began installing MATS monitoring systems at Plant Plant Crist in 2014 and Plant Daniel in 2015 to comply with the MATS rule. The 2016 projected expenditures for the Plant Crist MATS monitoring systems are $\$ 3.2$ million. The Plant Daniel MATS monitoring costs are included in the cost projection for the Plant Daniel scrubbers. Also, projected for this line item are capital retrofit projects for the Plant Crist scrubber. Gulf plans to replace Plant Crist's scrubber booster fan hubs, scrubber mist eliminator, and scrubber expansion joints, as well as increase the capacity of its scrubber wastewater treatment plant.

The Plant Daniel scrubber projects are currently scheduled for completion in October and November 2015. The 2016 capital expenditures for Gulf's ownership portion of the scrubber are projected to be $\$ 8.5$ million. The scrubbers when used in conjunction with the bromine and activated carbon injection systems will allow Plant Daniel to comply with the MATS standards.

Projections: The projected 2016 expenditures for this line item total $\$ 16,338,205$.

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## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016
Description and Progress Report of Environmental Compliance Activities and Projects

## Title: General Water Quality <br> PE 1280

## FPSC Approval: Order No. PSC-06-0972-FOF-EI

Description: Gulf Power purchased a boat during 2007 for surface water sampling required by the Plants Crist, Smith and Scholz National Pollutant Discharge Elimination System (NPDES) permits. The permits had new conditions which required Gulf to establish a biological evaluation plan and implementation schedule for each plant.

Accomplishments: The General Water Quality sampling boat was purchased during 2007. It is currently being used to conduct Gulf's surface water sampling for Plants Crist, Smith, and Scholz.

Project-to-Date: $\$ 0$.
Progress Summary: Retired

Projections: N/A

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016

## Description and Progress Report of Environmental Compliance Activities and Projects

Title: Coal Combustion Residual
PEs 0404, 0412, 0514, 1193, 1597, 1598, 1599, 1641, 1912, 1997

## FPSC Approval:

Description: On April 17, 2015 EPA published the final CCR rule in the Federal register regulating CCR disposal under Subtitle D of the Resource Conservation and Recovery Act (RCRA). The CCR rule is located in Title 40 Code of Federal Regulations (CFR) Parts 257 and 261. The CCR rule regulates the disposal of $C C R$, including coal ash and gypsum, as non-hazardous solid waste at active generating power plants. The CCR rule includes minimum criteria for active and inactive surface impoundments containing CCR and liquids, lateral expansions of existing units, and active landfills (collectively referred to as "CCR Units"). Failure to meet the minimum criteria can result in the mandated closure of a CCR Unit. The new criteria will apply to CCR Units at Gulf's Plants Crist, Smith, and Daniel.

Accomplishments: Gulf is planning to install groundwater monitoring wells at Plants Crist, Daniel, and Smith during 2015. The projected 2015 capital expenditures total \$660,000.

Project-to-Date: Plant-in-service of $\$ 760,000$ projected at December 2016.

## Progress Summary: N/A

Projections: The proposed 2016 capital expenditures totaling \$9,359,600 are associated with the installation of a new bottom ash handling system for Plant Crist, dust suppression control equipment for Plant Smith, as well as new CCR wastewater management systems for Plant Crist and Plant Smith.

# Gulf Power Company 

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016

## Description and Progress Report of Environmental Compliance Activities and Projects

Title: Mercury Allowances

FPSC Approval: Order No. PSC-07-0721-S-EI


#### Abstract

Description: Mercury Allowances were included as part of Gulf's March 2007 CAIR/CAMR/CAVR Compliance Program. The purchase of allowances in conjunction with the retrofit projects comprised the most reasonable, cost-effective means for Gulf to meet the CAIR, CAMR and CAVR requirements. On February 8, 2008, the U.S. Court of Appeals for the District of Columbia Circuit issued an opinion vacating EPA's CAMR. The vacatur became effective with the issuance of the court's mandate on March 14, 2008, nullifying CAMR mercury emission control obligations and monitoring requirements. In response to the CAMR vacatur, mercury allowances have been removed from Gulf's Air Quality Compliance Program.


Accomplishments: N/A
Project-to-Date: N/A
Progress Summary: N/A

Projections: N/A

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> Gulf Power Company
> Environmental Cost Recovery Clause (ECRC)
> January 2016-December 2016
> Description and Progress Report of Environmental Compliance Activities and Projects

Title: Annual $\mathrm{NO}_{\mathbf{x}}$ Allowances
FPSC Approval: Order No. PSC-07-0721-S-EI

## Description:

Although the retrofit installations set forth in Gulf's Air Quality Compliance Program significantly reduce emissions, they will not result in Gulf achieving CAIR compliance levels without the purchase of some emission allowances. Thus, Gulf's Compliance Program called for the purchase of allowances. The purchase of allowances in conjunction with the retrofit projects comprised the most reasonable, cost-effective means for Gulf to meet CAIR requirements. CAIR has now been replaced by CSAPR.

Accomplishments: N/A
Project-to-Date: N/A

## Progress Summary:

Gulf began surrendering annual NOx allowances during 2009.

Projections: Gulf is not projecting the need to purchase additional annual NOx CSAPR allowances during 2016.

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## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016

## Description and Progress Report of Environmental Compliance Activities and Projects

Title: Seasonal NO $\mathrm{N}_{\mathrm{x}}$ Allowances

FPSC Approval: Order No. PSC-07-0721-S-EI


#### Abstract

Description: Although the retrofit installations set forth in Gulf's Air Quality Compliance Program significantly reduce emissions, they would not result in Gulf achieving CAIR/CASPR compliance levels without the purchase of some emission allowances. Thus, Gulf's Compliance Program called for the purchase of allowances. The purchase of allowances in conjunction with the retrofit projects comprised the most reasonable, cost-effective means for Gulf to meet CAIR/CSAPR requirements.


Accomplishments: N/A
Project-to-Date: N/A

## Progress Summary:

Gulf began surrendering seasonal NOx allowances during 2009.
Projections: Gulf is not projecting the need to purchase additional seasonal NOx allowances during 2016.

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016

# Description and Progress Report of Environmental Compliance Activities and Projects 

## Title: $\mathbf{S O}_{\mathbf{2}}$ Allowances

FPSC Approval: Order No. PSC-94-0044-FOF-EI

## Description:

Part of Gulf's strategy to comply with the Acid Rain Program under the Clean Air Act Amendments of 1990 was to bring several of Gulf's Phase II generating units into compliance early and bank the $\mathrm{SO}_{2}$ allowances associated with those units. $\mathrm{SO}_{2}$ reductions under the CAIR program utilize this program requiring an increased rate of surrender beginning in 2010. Gulf's bank has slowly been drawn down over the years due to more allowances being consumed than are allocated to Gulf by EPA. Gulf proposed to meet this shortfall by executing forward contracts to secure allowances supplemented with forward contracts, swaps, and spot market purchases of allowances as prices dictate.

Accomplishments: Gulf executed forward contacts to secure allowances during 2006, 2007, and 2009.

Project-to-Date: N/A
Progress Summary: See Accomplishments

Projections: Gulf is not projecting the need to purchase any additional $\mathrm{SO}_{2}$ allowances during 2016. The projected $2016 \mathrm{O}_{\mathrm{M}} \mathrm{M} \mathrm{SO}_{2}$ allowance expenses are $\$ 226,209$.

# Gulf Power Company 

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016
Description and Progress Report of Environmental Compliance Activities and Projects

O \& M Line Item 1.1
Title: Sulfur

## FPSC Approval: Order No. PSC-94-0044-FOF-EI

## Description:

The Plant Crist Unit 7 sulfur trioxide $\left(\mathrm{SO}_{3}\right)$ flue gas system allowed for the injection of $\mathrm{SO}_{3}$ into the flue gas stream. The addition of sulfur trioxide to the flue gas improved the collection efficiency of the precipitator when burning a low sulfur coal. Sulfur trioxide agglomerated the particles which in turn enhanced the collection efficiency of the precipitator.

Accomplishments:
The flue gas injection system was retired during 2005.
Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: N/A

# Gulf Power Company <br> Environmental Cost Recovery Clause (ECRC) <br> January 2016-December 2016 <br> Description and Progress Report of Environmental Compliance Activities and Projects <br> O \& M Line Item 1.2 

## Title: Air Emission Fees

FPSC Approval: Order No. PSC-94-0044-FOF-EI

## Description:

Air Emission Fees are the annual fees required by the Florida Department of Environmental Protection (FDEP) and Mississippi Department of Environmental Quality (MDEQ) under Title V of the 1990 Clean Air Act Amendments.

## Accomplishments:

Fees have been paid by due dates.
Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: $\$ 560,352$

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016

## Description and Progress Report of Environmental Compliance Activities and Projects O \& M Line Item 1.3

Title: Title V

## FPSC Approval: Order No. PSC-95-0384-FOF-EI

## Description:

Title V expenses are associated with the preparation of the Clean Air Act Amendments (CAAA) Title V permit applications and the subsequent implementation of Title V permits. Renewal of the Title V permits is on a five year cycle (i.e. 2009, 2014, etc). Title V permits are periodically revised between renewals to incorporate major changes or modifications of a source.

## Accomplishments:

Gulf applied for Title V permit renewals for Plant Crist, Plant Scholz, and Plant Smith on May 19, 2014. An application to renew the Pea Ridge facility was submitted on July 25, 2014. All Title V 2014 permit renewals were finalized in January 2015 and are valid for a 5 year period. Title V permit amendments to incorporate a new Southern System NOx Averaging Plan for the Acid Rain Program (Title IV Permits) were issued by FDEP July, 2015 for Plant Crist, Plant Scholz and Plant Smith. Gulf's Perdido Landfill Gas-toEnergy Facility Title V permit is valid until March 1, 2017 and is not currently up for renewal.

Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: \$144,489

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016

# Description and Progress Report of Environmental Compliance Activities and Projects <br> O \& M Line Item 1.4 

Title: Asbestos Fees

FPSC Approval: Order No. PSC-94-1207-FOF-EI

## Description:

Asbestos Fees include both annual and individual project fees due to the Florida Department of Environmental Protection (FDEP) for asbestos abatement projects.

## Accomplishments:

Fees are paid as required by FDEP.
Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: \$1,000

Schedule 5P
Page 37 of 55

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016

## Description and Progress Report of Environmental Compliance Activities and Projects O \& M Line Item 1.5

Title: Emission Monitoring

## FPSC Approval: Order No. PSC-94-0044-FOF-EI

## Description:

The Emission Monitoring program provides quality assurance/quality control testing for Continuous Emission Monitoring systems, including Relative Accuracy Test Audits and Linearity Tests, as required by the Clean Air Act Amendments (CAAA) of 1990.

## Accomplishments:

All systems are in compliance.
Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: \$816,217

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016

# Description and Progress Report of Environmental Compliance Activities and Projects <br> O \& M Line Item 1.6 

## Title: General Water Quality

FPSC Approval: Order No. PSC-94-0044-FOF-EI
Order No. PSC-04-1187-FOF-EI
Order No. PSC-08-0775-FOF-EI
Order No. PSC-11-0553-FOF-EI

## Description:

The General Water Quality program includes activities undertaken pursuant to the Company's NPDES permit including dechlorination, surface and groundwater monitoring studies as well as soil contamination studies. This line item also includes expenses for Gulf's Cooling Water Intake program, the Impaired Waters Rule, Storm Water Maintenance, and the Impoundment Integrity project.

## Accomplishments:

All activities are on-going in compliance with applicable environmental laws, rules, and regulations.

Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: The 2016 projected costs for this line item are $\$ 2,009,676$.

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016

## Description and Progress Report of Environmental Compliance Activities and Projects O \& M Line Item 1.7

Title: Groundwater Contamination Investigation

## FPSC Approval: Order No. PSC-94-0044-FOF-EI

## Description:

The Groundwater Contamination Investigation project includes sampling and testing to determine possible environmental impacts to soil and groundwater from past herbicide applications at various substation sites. Once possible environmental impacts to groundwater and soils have been identified cleanup operations are initiated.

## Accomplishments:

The Florida Department of Environmental Protection has issued a No Further Action (NFA) letter or Site Rehabilitation Completion Order for 92 sites.

Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: \$3,437,656

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016

## Description and Progress Report of Environmental Compliance Activities and Projects O \& M Line Item 1.8

## Title: State NPDES Administration

FPSC Approval: Order No. PSC-95-1051-FOF-EI

## Description:

The State NPDES Administration fees are required by the State of Florida's National Pollutant Discharge Elimination System (NPDES) program administration. Annual and five year permit renewal fees are required for the NPDES industrial wastewater permits at Plants Crist, Smith and Scholz.

## Accomplishments:

Gulf has complied with the NPDES program administration fee submittal schedule.
Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: \$36,500

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016
Description and Progress Report of
Environmental Compliance Activities and Projects
O \& M Line Item 1.9

## Title: Lead \& Copper Rule

## FPSC Approval: Order No. PSC-95-1051-FOF-EI

## Description:

The Lead and Copper Rule expenses include potable water treatment and sampling costs as required by the Florida Department of Environmental Protection (FDEP) regulations.

## Accomplishments:

Gulf has complied with all sampling and analytical protocols.
Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: \$16,974

## Gulf Power Company

## Description and Progress Report of Environmental Compliance Activities and Projects <br> O \& M Line Item 1.10

Title: Environmental Auditing/Assessment

## FPSC Approval: Order No. PSC-94-0044-FOF-EI

## Description:

The Environmental Auditing/Assessment program ensures continued compliance with environmental laws, rules, and regulations through auditing and/or assessment of company facilities and operations.

## Accomplishments:

Audits and assessments completed to date have demonstrated compliance with environmental laws, rules, and regulations.

Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: $\$ 9,000$

# Gulf Power Company 

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016
Description and Progress Report of Environmental Compliance Activities and Projects

O \& M Line Item 1.11
Title: General Solid and Hazardous Waste

## FPSC Approval: Order No. PSC-94-0044-FOF-EI

## Description:

The General Solid and Hazardous Waste program provides for the proper identification, handling, storage, transportation and disposal of solid and hazardous wastes. This line item also includes O\&M expenses associated with Gulf's Spill Prevention Control and Countermeasures (SPCC) plans.

## Accomplishments:

Gulf has complied with all hazardous and solid waste regulations.
Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: \$771,232

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016
Description and Progress Report of Environmental Compliance Activities and Projects O \& M Line Item 1.12

Title: Above Ground Storage Tanks

## FPSC Approval: Order No. PSC-97-1047-FOF-EI

## Description:

The aboveground storage tank projects are required under the provisions of Chapter 62762 , F.A.C. which includes specific performance standards applicable to storage tank systems. These performance standards include maintenance requirements, installation of secondary containment and cathodic protection systems, as well as periodic tank integrity testing.

## Accomplishments:

Gulf has complied with all applicable storage tank requirements.
Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: \$164,181

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016

## Description and Progress Report of Environmental Compliance Activities and Projects O \& M Line Item 1.13

## Title: Low $\mathrm{NO}_{\mathrm{x}}$

FPSC Approval: Order No. PSC-98-0803-FOF-EI

## Description:

The Low $\mathrm{NO}_{\mathrm{x}}$ activity refers to the maintenance expenses associated with the Low $\mathrm{NO}_{\mathrm{x}}$ burner tips on Crist Units 4 \& 5 and Smith Unit 1 .

## Accomplishments:

Burner tips on Plant Crist Units 4 \& 5 and Plant Smith Unit 1 have been installed and are in-service. Plant Smith Unit 1 is projected to cease operations in March 2016. The Smith Unit 1 Low NOx burners are scheduled to be retired in April 2016.

Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: N/A

Gulf Power Company
Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016
Description and Progress Report of Environmental Compliance Activities and Projects

O \& M Line Item 1.14
Title: Ash Pond Diversion Curtains

FPSC Approval: Order No. PSC-98-1764-FOF-EI

## Description:

The installation of flow diversion curtains in the Plant Crist ash pond were required to effectively increase water retention time in the ash pond. Diversion curtains allow for the sedimentation/precipitation treatment process to be more effective in reducing levels of suspended particulate from the Plant Crist ash pond outfall.

## Accomplishments:

Plant Crist replaced the diversion curtains and dredged the pond during the 2009-2010 timeframe.

Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: N/A

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016
Description and Progress Report of Environmental Compliance Activities and Projects O \& M Line Item 1.15

## Title: Mercury Emissions

## FPSC Approval: Order No. PSC-99-0912-FOF-EI

Description: The Mercury Emissions program pertains to requirements for Gulf to periodically analyze coal shipments for mercury and chlorine content. The Environmental Protection Agency (EPA) mandated that shipments of coal would be analyzed for mercury and chlorine only during 1999. No further notices of continued sampling requirements of coal shipments beyond 1999 have been issued by EPA, therefore no expenses have been planned for this activity.

## Accomplishments:

Coal shipments were analyzed as required during 1999. Sampling and analytical requirements are not expected during 2016.

Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: N/A

# Gulf Power Company <br> Environmental Cost Recovery Clause (ECRC) <br> January 2016-December 2016 <br> Description and Progress Report of Environmental Compliance Activities and Projects <br> O \& M Line Item 1.16 

## Title: Sodium Injection

FPSC Approval: Order No. PSC-99-1954-FOF-EI

## Description:

This line item includes the $O \& M$ expenses associated with the sodium injection systems at Plant Smith and Plant Crist. Sodium carbonate is added to the Plant Crist and Plant Smith coal supply to enhance precipitator efficiencies when burning certain low sulfur coals.

## Accomplishments:

Sodium carbonate injection is used at Plant Smith and Plant Crist as necessary when low sulfur coal is burned.

Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: \$72,800

Gulf Power Company
Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016
Description and Progress Report of Environmental Compliance Activities and Projects

O \& M Line Item 1.17

## Title: Gulf Coast Ozone Study (GCOS)

## FPSC Approval: Order No. PSC-00-0476-FOF-EI

## Description:

This project referred to Gulf's participation in the Gulf Coast Ozone Study (GCOS) which was a joint modeling analysis between Gulf Power and the State of Florida to provide an improved basis for assessment of eight-hour ozone air quality for Northwest Florida. The goal of the project was to develop strategies for ozone ambient air attainment to supplement the Florida Department of Environmental Protection (FDEP) studies submitted to the Environmental Protection Agency (EPA) for Escambia and Santa Rosa counties.

Accomplishments: The GCOS project was completed during 2006.
Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: N/A

## Gulf Power Company

## Environmental Cost Recovery Clause (ECRC)

January 2016-December 2016

## Description and Progress Report of Environmental Compliance Activities and Projects O \& M Line Item 1.18

## Title: SPCC Substation Project

## FPSC Approval: Order No. PSC-03-1348-FOF-EI

## Description:

During July 2002 EPA published a revision to Title 40 Code of Regulation Part 112, commonly referred to as the Spill Prevention Control and Countermeasures (SPCC) regulation. The revision expanded applicability of the rule to specifically include oil containing electrical transformers and regulators. Gulf was required to install additional containment and/or diversionary structures or equipment at several substations to prevent a potential discharge of oil to navigable waters of the United States or adjoining shorelines.

Accomplishments: Gulf has assessed its substations to determine which sites are subject to the revised SPCC regulations. Additional containment has been added to the substations that were identified as having a reasonable risk of discharging oil into navigable waters of the United States or adjoining shorelines.

Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: N/A

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016

## Description and Progress Report of Environmental Compliance Activities and Projects O \& M Line Item 1.19

Title: FDEP NO $_{\mathbf{x}}$ Reduction Agreement

FPSC Approval: Order No. PSC-02-1396-FOF-EI
Description: This line item includes the O\&M expenses associated with the Crist Unit 7 SCR and the Crist Units 4 and 5 Selective Non-Catalytic Reduction (SNCR) projects that were included as part of the Florida Department of Environmental Protection (FDEP) and Gulf Power Agreement entered into on August 28, 2002. Anhydrous ammonia, urea, air monitoring, catalyst regeneration, and general operation and maintenance expenses are included in this line item.

Accomplishments: The Crist Unit 7 SCR and the Crist Units 4 and 5 SNCRs are fully operational. The Crist Unit 6 SNCR was retired when the Crist Unit 6 SCR was placed in-service during the Spring of 2012. The Crist Unit 6 SCR was installed as part of the Air Quality Compliance Program.

Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: \$952,387

Gulf Power Company<br>Environmental Cost Recovery Clause (ECRC)<br>January 2016-December 2016<br>Description and Progress Report of Environmental Compliance Activities and Projects<br>O \& M Line Item 1.20

## Title: Air Quality Compliance Program

## FPSC Approval: Order No. PSC-06-0972-FOF-EI <br> Order No. PSC-13-0506-PAA-EI

Description: This line item includes the O\&M expenses associated with Gulf's Air Quality Compliance program and the Climate Registry. More specifically, the line item includes the cost of anhydrous ammonia, hydrated lime, urea, limestone and general O\&M expenses.

Accomplishments: The Plant Smith Unit 1 and Unit 2 SNCRs were placed in service during May 2009 and December 2008, respectively. The Smith SNCRs are projected to be retired in April 2016 after the coal units cease operations in March 2016. The Crist Units 4-7 scrubber project was placed in-service December of 2009 and the Crist Unit 6 hydrated lime injection system was placed in-service in 2011. The Plant Crist Unit 6 SCR was placed-in-service in April of 2012. The Plant Daniel scrubbers are currently scheduled for completion in the October to November 2015 time period. The Plant Daniel Bromine and Activated Carbon Injection systems will be completed during the same timeframe. Gulf will be incurring O\&M expenses associated with these projects during 2016.

Fiscal Expenditures: N/A
Progress Summary: See Accomplishments
Projections: \$27,146,432

# Gulf Power Company <br> Environmental Cost Recovery Clause (ECRC) January 2016-December 2016 

## Description and Progress Report of Environmental Compliance Activities and Projects <br> O \& M Line Item 1.21

Title: Maximum Achievable Control Technology (MACT) Information Collection Request (ICR)

FPSC Approval: Order No. PSC-09-0759-FOF-EI
Description: During early 2010 EPA finalized an extensive Information Collection Request (ICR) for coal and oil fired steam electric generating units to support Maximum Achievable Control Technology (MACT) rulemaking under Section 112 of the Clean Air Act (CAA). The ICR required submission of information on control equipment efficiencies, emissions, capital and $O \& M$ costs, and fuel data for all coal and oil fired generating units greater than 25 MW .

## Accomplishments:

Gulf completed the Part I \& 2 MACT ICR survey and the Part 3 emissions testing reports during 2010.

Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: N/A

# Gulf Power Company 

Environmental Cost Recovery Clause (ECRC)
January 2016-December 2016
Description and Progress Report of Environmental Compliance Activities and Projects

O \& M Line Item 1.22

## Title: Crist Water Conservation

FPSC Approval: Order No. PSC-08-0775-FOF-EI
Description: Gulf Power entered into an agreement with the Emerald Coast Utilities Authority (ECUA) to begin utilizing reclaimed water to reduce the demand for groundwater and surface water withdrawals. This line item includes general O\&M expenses associated with the Plant Crist reclaimed water system such as piping and valve maintenance and pump replacements.

## Accomplishments:

Gulfs began receiving reclaimed water from ECUA during November 2010.

Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

Projections: \$570,300

Gulf Power Company<br>Environmental Cost Recovery Clause (ECRC)<br>January 2016-December 2016<br>Description and Progress Report of Environmental Compliance Activities and Projects<br>O \& M Line Item 1.23

## Title: Coal Combustion Residual

## FPSC Approval:

Description: On April 17, 2015 EPA published the final CCR rule in the Federal register regulating CCR disposal under Subtitle D of the Resource Conservation and Recovery Act (RCRA). The CCR rule is located in Title 40 Code of Federal Regulations (CFR) Parts 257 and 261. The CCR rule regulates the disposal of CCR, including coal ash and gypsum, as non-hazardous solid waste at active generating power plants. The new rule will apply to CCR Units at Gulf's Plants Crist, Smith, and Daniel.

In addition, pursuant to its authority granted under the Clean Water Act, the FDEP issues National Pollutant Discharge Elimination System (NPDES) permits for each of Gulf's generating facilities. A draft NPDES renewal permit for Plant Scholz (FL0002283) was issued on August 24, 2015 and is expected to become final in the fourth quarter of 2015. This permit renewal has new conditions requiring closure of the Plant Scholz CCR Unit.

## Accomplishments:

By the effective date of the CCR rule, October 19, 2015, any CCR Unit subject to the EPA's new rule must have a publicly available website established, weekly and monthly inspections initiated, and a fugitive dust plan prepared. During 2015, Gulf is also required to install permanent markers at all CCR ponds and have annual inspections of the CCR impoundments and landfills performed by a professional engineer (PE). In 2016, Gulf will prepare closure and post-closure care plans for the CCR Units, conduct hydrologic and hydraulic capacity studies of the CCR ponds, compile a history of the structural integrity reports and design information for the CCR Units, prepare stormwater management plans, and conduct annual dust control and engineering inspections as well as groundwater monitoring.

Pursuant to the draft Plant Scholz NPDES permit, a CCR closure plan is required to be submitted to the FDEP in 2016 for review and approval. Once approved, Gulf will move forward with activities required for closure.

Fiscal Expenditures: N/A
Progress Summary: See Accomplishments

## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
Calculation of the Energy \& Demand Allocation \% By Rate Class
January 2016 - December 2016

|  | (1) | $\begin{gathered} \text { (2) } \\ \text { Jan - Dec. } 2016 \end{gathered}$ | (3) | (4) | (5) | (6) | (7) | (8) | (9) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Rate Class | Average 12 CP <br> Load Factor at Meter $\qquad$ (\%) | Projected <br> Sales <br> at Meter <br> (KWH) | Projected <br> Avg 12 CP <br> at Meter <br> (KW) | Demand Loss Expansion Factor | $\qquad$ <br> Energ Expansion | Projected Sales at Generation (KWH) | Projected Avg 12 CP at Generation $\qquad$ (KW) | Percentage of KWH Sales at Generation (\%) | Percentage of 12 CP Demand at Generation (\%) |
| RS, RSVP, RSTOU | 57.025261\% | 5,268,731,000 | 1,051,832 | 1.00820508 | 1.00777864 | 5,309,714,562 | 1,060,462 | 48.17163\% | 57.28868\% |
| GS | 65.082883\% | 283,353,000 | 49,564 | 1.00820395 | 1.00777656 | 285,556,512 | 49,971 | 2.59067\% | 2.69954\% |
| GSD, GSDT, GSTOU | 75.900487\% | 2,572,527,000 | 385,854 | 1.00800263 | 1.00762887 | 2,592,152,474 | 388,942 | 23.51693\% | 21.01155\% |
| LP, LPT | 85.148219\% | 979,635,000 | 130,977 | 0.97344897 . | 0.98364378 | 963,611,874 | 127,500 | 8.74223\% | 6.88784\% |
| PX, PXT, RTP, SBS | 88.430490\% | 1,773,222,000 | 228,280 | 0.95247952 | 0.96644352 | 1,713,718,911 | 217,432 | 15.54747\% | 11.74621\% |
| OS-I/II | 782.722832\% | 111,141,000 | 1,616 | 1.00802086 | 1.00777465 | 112,005,082 | 1,629 | 1.01615\% | 0.08803\% |
| OS-III | 101.182319\% | 45,381,000 | 5,106 | 1.00838359 | 1.00778595 | 45,734,334 | 5,149 | 0.41492\% | 0.27815\% |
| TOTAL |  | 11,033,990,000 | 1,853,231 |  |  | 11,022,493,749 | 1,851,086 | 100.00000\% | 100.00000\% |

Notes:
(1) Average 12 CP load factor based on actual 2012 load research data
(2) Projected KWH sales for the period January 2016 - December 2016
(3) Calculated: $(\operatorname{Col} 2) /(8,784 \times \operatorname{Col} 1),(8,784$ hours $=$ the $\#$ of hours in 1 year)
(4) Based on demand losses identified in Docket No. 110138-EI
(5) Based on energy losses identified in Docket No. 110138-EI
(6) $\mathrm{Col} 2 \times \mathrm{Col} 5$
(7) $\mathrm{Col} 3 \times \mathrm{Col} 4$
(8) $\mathrm{Col} 6 /$ total for Col 6
(9) $\mathrm{Col} 7 /$ total for Col 7

## Gulf Power Company

## Environmental Cost Recovery Clause (ECRC)

## Calculation of the Energy \& Demand Allocation \% By Rate Class

January 2016 - December 2016

|  | (1.) | (2) | (3) | (4) | (5) | (6) | (7) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
| Rate Class | Percentage of KWH Sales at Generation (\%) | Percentage of 12 CP Demand at Generation (\%) | EnergyRelated Costs | DemandRelated Costs | Total Environmental $\qquad$ | Projected <br> Sales <br> at Meter <br> (KWH) | Environmental Cost Recovery Factors ( $\subset /$ KWH) |
| RS, RSVP, RSTOU | 48.17163\% | 57.28868\% | 19,833,434 | 91,289,022 | 111,122,456 | 5,268,731,000 | 2.109 |
| GS | 2.59067\% | 2.69954\% | 1,066,642 | 4,301,694 | 5,368,336 | 283,353,000 | 1.895 |
| GSD, GSDT, GSTOU | 23.51693\% | 21.01155\% | 9,682,494 | 33,481,725 | 43,164,219 | 2,572,527,000 | 1.678 |
| LP, LPT | 8.74223\% | 6.88784\% | 3,599,389 | 10,975,714 | 14,575,103 | 979,635,000 | 1.488 |
| PX, PXT, RTP, SBS | $15.54747 \%$ | $11.74621 \%$ | 6,401,273 | 18,717,485 | 25,118,758 | 1,773,222,000 | 1.417 |
| OS-I, OS-II | 1.01615\% | 0.08803\% | 418,374 | 140,275 | 558,649 | 111,141,000 | 0.503 |
| OS-III | 0.41492\% | 0.27815\% | 170,833 | 443,230 | 614,063 | 45,381,000 | 1.353 |
| TOTAL | 100.00000\% | 100.00000\% | \$41,172,439 | \$159,349,145 | 200,521,584 | 11,033,990,000 | 1.817 |

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## Gulf Power Company

Environmental Cost Recovery Clause (ECRC)
Calculation of the Projected Period Amount
January 2016 - December 2016

FPSC Capital Structure and Cost Rates

| Line | Capital Component | (1) | (2) | (3) | (4) | (5) | (6) |
| :---: | :---: | :---: | :---: | :---: | :---: | :---: | :---: |
|  |  |  |  |  |  | Revenue | Monthly <br> Revenue |
|  |  | Jurisdictional Amount | Ratio | Cost <br> Rate | Weighted | Requirement Rate | Requirement |
|  |  | (\$000s) | $\frac{\text { Rat }}{\%}$ | \% | \% | \% | \% |
| 1 | Bonds | 710,379 | 36.4100 | 4.49 | 1.6348 | 1.6348 |  |
| 2 | Short-Term Debt | 21,331 | 1.0933 | 0.27 | 0.0030 | 0.0030 |  |
| 3 | Preferred Stock | 79,362 | 4.0676 | 6.14 | 0.2498 | 0.4067 |  |
| 4 | Common Stock | 713,646 | 36.5774 | 10.25 | 3.7492 | 6.1037 |  |
| 5 | Customer Deposits | 21,109 | 1.0819 | 2.40 | 0.0260 | 0.0260 |  |
| 6 | Deferred Taxes | 403,636 | 20.6881 |  |  |  |  |
| 7 | Investment Tax Credit | 1,592 | $\underline{0.0816}$ | 7.31 | 0.0060 | $\underline{0.0086}$ |  |
| 8 | Total | $\underline{1,951.055}$ | $\underline{100,0000}$ |  | 5.6688 | 8.1828 | 0.6819 |
|  | ITC Component: |  |  |  |  |  |  |
| 9 | Debt | 710,379 | 47.2519 | 4.49 | 2.1216 | 0.0017 |  |
| 10 | Equity-Preferred | 79,362 | 5.2789 | 6.14 | 0.3241 | 0.0004 |  |
| 11 | -Common | 713,646 | $\underline{47.4692}$ | 10.25 | 4.8656 | $\underline{0.0065}$ |  |
| 12 |  | 1,503,387 | 100.0000 |  | 7.3113 | $\underline{0.0086}$ |  |
| Breakdown of Revenue Requirement Rate of Return between Debt and Equity: |  |  |  |  |  |  |  |
| 13 | Total Debt Component | Lines 1, 2, 5, and |  |  |  | 1.6655 | 0.1388 |
|  | Total Equity Componen | (Lines 3, 4, 10, | 11) |  |  | 6.5173 | 0.5431 |
| 15 | Total Revenue Requiren | ent Rate of Ret |  |  |  | 8.1828 | 0.6819 |

Column:
(1) Based on the May 2015 Surveillance Report, Schedule 4.
(2) Column (1) / Total Column (1)
(3) Based on the May 2015 Surveillance Report, Schedule 4.
(4) Column (2) x Column (3)
(5) For equity components: Column (4) / (1-.38575); $38.575 \%=$ effective income tax rate For debt components: Column (4)
(6) Column (5) / 12

IN RE: Environmental Cost ) Recovery Clause

## CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was furnished by overnight mail this 28th day of August, 2015 to the following:

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[^0]:    Notes:
    (1) From Schedule 6P, Col 8
    (2) From Schedule 6P, Col 9
    (3) Col $1 \times$ Total Energy $\$$ from Schedule 1P, line 5
    (4) $\operatorname{Col} 2 \times$ Total Demand $\$$ from Schedule $3 P$, line 5
    (5) $\mathrm{Col} 3+\mathrm{Col} 4$
    (6) Projected KWH sales for the period January 2016 - December 2016
    (7) $\operatorname{Col} 5 \times 100 / \mathrm{Col} 6$

